EXHIBIT A 1 of 2

FTC MOTION FOR TEMPORARY RESTRAINING ORDER EXHIBIT 26

Declaration of FTC Paralegal Elena Hoffman Part 1: Declaration—Attachment C, pages 1 – 206

DECLARATION OF ELENA HOFFMAN PURSUANT TO 28 U.S.C. § 1746

- I, Elena Hoffman, hereby state that I have personal knowledge of the facts set forth below. If called as a witness, I could and would testify competently as follows:
- 1. I am over eighteen years of age and a citizen of the United States. My formal education includes a Bachelor of Arts degree from the University of Pennsylvania obtained in May 2020.
- 2. I am employed by the Federal Trade Commission ("FTC") as an Honors Paralegal in the Division of Litigation Technology and Analysis within the Bureau of Consumer Protection. I have held this position since August 2020. My office address is 600 Pennsylvania Ave., NW, CC-6201, Washington, DC 20580.
- 3. As an Honors Paralegal, my job functions include providing litigation and investigation support to Bureau of Consumer Protection attorneys and other staff involved in the litigation and investigation of FTC cases. In the normal course of assisting with investigations, I regularly utilize consumer complaint databases to access a broad range of complaints made by various consumers whom I then personally contact via phone and email. I also regularly use Internet search engines to find websites, videos, and other relevant information, and software to preserve copies of this information.

4. In the course of my duties, I was assigned to work on the FTC's investigation of several entities and individuals selling credit repair and related services through a multi-level marketing structure, including: Financial Education Services ("FES"), United Credit Education Services ("UCES"), United Wealth Education ("UWE"), and Youth Financial Literacy Foundation ("YFLF"). I have assisted the FTC attorneys with this investigation by, among other things, contacting and interviewing consumers who have submitted complaints about the Defendants, preserving online content related to the Defendants, and translating some of the online Spanish-language content related to the Defendants.

CONSUMER INTERVIEWS

5. Over the course of the investigation, I conducted telephone interviews with consumers who filed complaints against Defendants with the Better Business Bureau ("BBB"), Consumer Sentinel ("Sentinel"), or the Consumer Financial Protection Bureau ("CFPB").

Interview with Caitlin Bedwell

- 6. On or around April 21, 2021, I interviewed Caitlin Bedwell who is a resident of Granbury, Texas.
- 7. Ms. Bedwell stated that on or around January or February 2019, she was scrolling through Facebook when she came across an ad someone had posted in the Buy, Sell, Trade Facebook group for residents of Hood County, Texas. The ad was

promoting an opportunity to bump your credit score up. The post caught her eye because her husband, Brian, had student loans that were negatively impacting his credit.

- 8. Ms. Bedwell stated that the ad was posted by a man, and she decided to reach out to him via Facebook Messenger that same day. She sent him a message from the joint Facebook account she shared with Brian. The man asked her what she was trying to repair on her credit, and she explained that Brian had student loans and divorce fees from his previous marriage that were bringing down his credit score. The man proceeded to introduce a credit repair service, known as Financial Education Services or FES, that would delete accounts in negative from Brian's credit report, which would in turn increase his credit score by a certain amount of points. The man claimed that Brian's student loan accounts would be deleted from his credit report. The man guaranteed that Brian's credit report would be fully "cleaned out" after six months and that it was a very easy process overall.
- 9. Ms. Bedwell stated that after hearing about the positive ways in which Brian's credit would be improved through FES, she discussed the opportunity with him and ultimately decided to get him registered for the credit repair service. They completed the registration process through the gentleman, who was going to serve as Brian's new FES agent. She submitted Brian's name, address, social security number, and banking information to their agent via Facebook Messenger.

- 10. Ms. Bedwell stated that after submitting this information, the agent sent Brian and her a link to the credit repair service's customer portal, as well as Brian's log-in credentials. When Brian and she first logged in to the portal, she saw that Brian did have to sign something electronically, though she could not recall what it was. She believes it was something authorizing FES to both take funds from Brian's bank account, as well as access his credit report. She did not recall Brian receiving a contract cancellation form or a written statement called "Consumer Credit File Rights Under State and Federal Law."
- 11. Ms. Bedwell stated that the initial registration cost for this service was about \$100, which was supposedly cheaper than normal. Brian and she received a discount on the service since their agent was running a special at the time. There was also a monthly fee for the services that they were required to pay the first month. This was all paid through automatic deposit payments directly to FES.
- 12. Ms. Bedwell stated that soon after Brian's registration was complete, their agent asked her if she wanted to register as an agent for FES to help Brian sell the credit repair service to other people. However, she was not interested. She just wanted Brian to get his credit repaired.
- 13. Ms. Bedwell stated that after completing Brian's FES registration, they were not informed of any additional steps they would need to take to advance the credit repair process. As such, they decided to simply sit back and let the process

complete itself. After a month and a half had passed, Brian and she decided to check and see if any progress had been made on Brian's credit. They checked by logging into the customer portal, which had a credit score tracker for Brian. They saw that there had been absolutely no changes made to his score, so they decided to reach out to the agent and inquire about why this might have been. The agent did not respond to their message, but they were not too concerned by it at the time. Brian and she simply assumed they had checked Brian's score too quickly, especially seeing as the service was not supposed to be completed for another four and a half months.

- 14. Ms. Bedwell stated that as the next couple of months unfolded, their concerns began to escalate. Brian and she would check Brian's credit score on the website tracker about 2-3 times a month, but the number never changed. They began reaching out to the agent more and more frequently to figure out why Brian's score remained stagnant, but the agent never once replied to them. Even though the agent was ignoring their messages, he was still active on Facebook. The agent continued to advertise the credit repair service in the Buy, Sell, Trade group. Whenever she noticed the agent had posted a new ad, she would comment on the post stating she had "DMed" (direct messaged) him, but he disregarded every single comment she left.
 - 15. Ms. Bedwell stated that six months passed without any improvements to

Brian's credit score and zero communication from their agent. Brian and she decided to cancel the service and request a refund, so they reached out to the agent in hopes he would at the very least respond to help them cancel Brian's registration. When the agent did not answer, they reached out to FES corporate, but heard nothing from them as well. When they noticed that FES had charged Brian's account for an additional month of registration even after the couple had requested to cancel, they chose to file a complaint against FES with the Better Business Bureau. She filed this complaint on August 22, 2019, under Brian's name.

16. Ms. Bedwell stated that after filing the BBB complaint, FES corporate finally reached back out to her and instructed Brian to log in to his customer portal and send the dispute letters present to the three credit bureaus. FES corporate explained that sending out these dispute letters was the way Brian's credit was supposed to improve through the credit repair service. However, no one had told them about these dispute letters over the course of Brian's six months being registered with FES, not from the agent, nor from FES themselves. Ms. Bedwell stated that if she had known that FES was only going to have Brian send out form dispute letters, she would have never had him register for the credit repair service in the first place seeing as they could just write and send dispute letters out on their own.

17. Ms. Bedwell stated that after making this discovery, she had FES cancel

Brian's registration, and Brian was subsequently issued a refund. However, she highly doubts FES would have done this if she had not involved the BBB, seeing as FES was ignoring her cancellation requests before she filed the complaint. She did not understand why her agent completely ignored the couple after she turned down his offer to register as an agent, and why no one, not even FES corporate, gave Brian a heads-up about the dispute letters prior to their cancellation request six months after registering for the service.

Interview with Colin Estwick

- 18. On or around January 14, 2020, I interviewed Colin Estwick of Odessa, Texas.
- 19. Mr. Estwick stated that on or around July of 2019, he was chatting with a cousin of his that he grew up with and was very close to. He told her he was interested in getting his credit repaired since he had a couple of late child support payments that were negatively affecting his credit. His cousin told him that she had a friend named Randall Johnson who might be able to help him out, so she connected them.
- 20. Mr. Estwick stated that he spoke with Johnson on the phone, and Johnson introduced himself as being an agent for United Credit Education Services ("UCES"). Johnson asked him if there were any particular items he wanted to see removed from his credit report, and he told him about the child support payments.

Johnson explained to him that while UCES would not be able to get rid of his child support payments altogether, they would be able to hide them from his credit report and keep them from affecting his credit score. Johnson also guaranteed that UCES would bump his credit score up above 700 points within seven months.

- 21. Mr. Estwick stated that he really wanted to improve his credit, so he decided to register for the service. The service would supposedly cost him about \$89 per month. He provided Johnson with a bunch of his personal information as part of the registration process, including his full name, date of birth, social security number, and more. He recalled Johnson reading some type of disclosure to him, which basically stated that by registering for UCES' credit repair services, he would be granting UCES attorneys the right to run his credit report and take control over his credit reparation situation. Johnson also provided him with some brochures.
- 22. Mr. Estwick stated that he came to understand that the credit repair services advertised by UCES involved attorneys writing dispute letters addressed to credit bureaus on his behalf. The lawyers would write dispute letters requesting for the credit bureaus to remove certain items from his credit report, and the lawyers would then send him these letters for him to sign and subsequently mail out directly to the credit bureaus. This process bothered him because he had not initially realized that the credit repair service was limited to providing him form

letters that he would have to mail out himself. He felt that the attorneys, if there even were any, appeared to write these letters at an extremely slow pace. A significant amount of time passed in between different rounds of letters. He never spoke to an attorney while he was signed up with UCES.

- 23. Mr. Estwick stated that he periodically checked his credit throughout the time he was enrolled with UCES. While the "lawyers" had successfully removed some items from his credit report, the items they were removing were not necessarily things that would make any difference in his overall credit.

 Furthermore, not much was accomplished during the initial 3-4 months he was enrolled with UCES because he was supposedly required to submit his driver's license and social security number to the credit bureaus on top of the letters. No one at UCES informed him of this, including Johnson.
- 24. Mr. Estwick stated that Johnson gave him the impression that he would serve as his coach throughout the credit repair process, and that they would have monthly phone call check-ins concerning the status of his credit. However, this was not the case. Whenever he tried to get in contact with Johnson after his initial UCES registration, Johnson made various excuses not to talk with him and would deliberately avoid his calls.
- 25. Mr. Estwick stated that on or around March of 2020, he decided to terminate his enrollment with FES, as he did not feel their credit repair service was

a worthwhile investment. If there had been any truth to Johnson's claim that UCES would bump his credit score to at least 700 points within seven months of enrollment, then Ehis credit score would have reached this milestone by February 2019. However, this was not the case. He was enrolled with UCES for over a year and a half, and his credit score never rose above a 700. Moreover, UCES never managed to get his late child support payments from appearing in his credit history.

Interview with Demetris Pugh

- 26. On or around November 4, 2021, I interviewed Demetris Pugh of Narrowsburg, New York.
- 27. Ms. Pugh stated that in or around the summer of 2019, she received a direct message on Facebook Messenger from a Facebook friend of hers. She believed they went to high school together, but they were not close. The Facebook friend had messaged her about a credit repair service opportunity that he claimed would remove negative accounts from her credit report, thus subsequently raising her credit score. The Facebook friend explained that he worked for the company offering these services, which was called United Credit Education Services ("UCES"). He was an agent for the company.
- 28. Ms. Pugh stated that when she inquired about how this credit repair process worked, the Facebook friend explained that UCES would prepare dispute letters on

her behalf that would list any negative accounts she possessed, and then claim that these accounts were all erroneous. These letters were then supposed to be sent out to the credit bureaus. The Facebook friend sent her a link to UCES' website so that she could learn more about the services and products that the company offered.

- 29. Ms. Pugh stated that after speaking with her Facebook friend and reviewing the UCES website, she decided it seemed like a smart idea to go ahead and try to repair her credit with UCES. As such, she informed the friend that she wanted to register for UCES' credit repair services. The Facebook friend sent her a link to a customer portal that would allow her to register herself for the services. He told her to list him as her referral. She recalled having to submit her name, address, phone number, social security number, and credit card information during the UCES registration process.
- 30. Ms. Pugh stated that during this registration process, she did not receive or sign any contract. She also did not receive an estimated date by which her credit repair services would be completed, or any type of cancellation form with instructions on how to cancel her services. She did not receive a written statement called "Consumer Credit File Rights Under State and Federal Law" or any type of disclaimer about the services she was about to receive.
- 31. Ms. Pugh stated that the only thing she recalled consenting to during this registration process was for UCES to take money out of her account every month.

She was charged a one-time credit repair service set-up fee of about \$99, as well as an \$89 fee for the services themselves. This meant that the total amount she paid UCES during registration was about \$188. The \$89 fee would be charged automatically to her credit card monthly as long as she was registered for UCES' credit repair services.

- 32. Ms. Pugh stated that after completing her registration, she received a unique username and password that allowed her to access her customer portal. This portal listed her credit score and she recalled the portal displaying various examples about how much her score would increase depending on which of her negative accounts got removed from her credit report.
- 33. Ms. Pugh stated that she recalled seeing her friend post UCES credit repair service testimonials on his Facebook feed that cited specific figures. He posted testimonials from what seemed like his clients that made claims such as: "My credit score used to be X, but now it's X and I got X accounts removed from my report."
- 34. Ms. Pugh stated that soon after she had registered with UCES, she received her first batch of dispute letters in the mail from them. There were three letters; one for each of the three credit bureaus. The language used in the letters appeared as though it had been derived from some generic template, as all three letters read the same and did not seem to be very detailed. She recalled having to sign the letters

and then pay the postage fee to actually send the letters out to the credit bureaus. She also remembered having to provide the credit bureaus with a copy of her social security card and driver's license. She was a little perplexed on why she had to do all this extra work herself when she was already paying UCES \$89 a month for the credit repair services. The only part of the dispute letter process that UCES was actually doing was writing the letters.

- 35. Ms. Pugh stated that UCES required her to provide updated reports on any responses she received from the credit bureaus following our dispute letters. Every 30-45 days, UCES would send her a new set of dispute letters to mail out.
- 36. Ms. Pugh stated that she was registered for UCES' credit repair services for about a year. Over the course of this year, UCES only managed to remove one item from her credit report. This item was a Kay Jewelers credit card that she had owed about \$2,400 on. The credit card was already in collections by the time UCES began disputing it, and it was removed from her credit report a couple months after she had begun using the credit repair services. Her credit score did go up slightly after this credit card was removed, but not by much. Over the course of her year as a UCES client, all of her larger negative entries, including her student loans, remained on her credit report.
- 37. Ms. Pugh stated that after about a year of investing in UCES' credit repair services, in or around the summer of 2020, she got tired of paying so much money

towards a service that had not accomplished much for her credit. She grew skeptical of UCES, and began researching the legality of credit repair companies online. Based on her research, it appeared to her as though the credit repair services UCES was offering might not in fact be legal.

- 38. Ms. Pugh stated that this discovery, as well as her general displeasure with the credit repair services, led her to cancel her service subscription in the summer of 2021.
- 39. Ms. Pugh stated that following the completion of her cancellation, she filed a complaint with the CFPB on or around August 6, 2021, requesting a refund of all the money she paid to UCES over the course of her year registered as a credit repair service recipient. UCES responded to this CFPB complaint claiming they would not return any of her money.
- 40. Ms. Pugh stated that she learned that a friend of hers who had a similarly negative experience with UCES also requested a refund of her services through the CFPB and had successfully been refunded. This inspired her to try and request a refund from UCES one more time, and she submitted another complaint to the CFPB on or around August 22, 2021. As of the time of our interview, UCES had yet to respond to this second complaint, and has not refunded Ms. Pugh her money.

41. Ms. Pugh stated that all in all, she was very upset by the experience she had with UCES. She paid a significant amount of money to them for miniscule results. It was a waste of money and time for her.

Interview with Osmel Villarreal

- 42. On or around January 13, 2022, I interviewed Osmel Villarreal of Las Vegas, Nevada.
- 43. Mr. Villarreal stated that in or around 2017, he was scrolling on Facebook when he came across a post made by someone named Julio Fernandez. He did not know Fernandez personally, but they were friends on Facebook. His post, which was in Spanish, said something along the lines of "Gana dinero mientras reparas tu credito," which translates to "Earn money while you repair your credit." He had a bankruptcy that was negatively affecting his credit, so this credit repair opportunity Fernandez posted about caught his eye. As such, he decided to reach out to Fernandez over Facebook Messenger to learn more.
- 44. Mr. Villarreal stated that Fernandez explained in Spanish over Messenger that the credit repair service he was advertising was run through Financial Education Services, and that he held "presidential status" in the company. Fernandez told him that FES's credit repair service would remove all negative accounts from his credit report. He told Fernandez about his bankruptcy, and Fernandez claimed that FES would wipe that from his credit report. His

understanding from Fernandez was that FES had a special relationship with the credit bureaus that allowed it to remove all negative items from its customers' credit reports. Fernandez explained that this credit repair process would take around six months to one year. Fernandez never explicitly stated how many points FES would raise his credit by, but he sent him some pictures that showed testimonials of FES credit repair recipients saying how many points their credit scores had supposedly increased after enrolling in FES's services.

45. Mr. Villarreal stated that Fernandez further explained that on top of getting his credit repaired with FES, he could get paid for helping other people repair their credit if he signed up as an agent with the company. This business opportunity, which involved signing other people up with the company, was supposedly very flexible, and he could work by himself and be his own boss. Fernandez told him he had achieved his "presidential status" in just one month working with the company, and that Fernandez would help him achieve the same. After registering as an agent with the company, he would gain access to a virtual office that would contain advertising material he could use to help him get the word out about FES and find new people to register. Fernandez promised him that he would earn a lot of money by enrolling in this business opportunity. Fernandez said that as an agent he would still get his credit repaired through the credit repair service.

- 46. Mr. Villarreal stated that he was most interested in improving his credit score and removing his bankruptcy from his credit report, but he figured that earning some extra money on the side could be nice. As such, he decided he would register to become an agent.
- 47. Mr. Villarreal stated that after he expressed interest in becoming an agent to Fernandez, he sent him a link where he would be able to register for FES agent "membership." He recalled having to enter in personal information such as his name, Social Security Number, and date of birth, along with his credit card information. He had to pay an initial registration fee of somewhere around \$300, followed by monthly payments of \$89.
- 48. Mr. Villarreal stated that while he recalled having to agree to "terms and conditions" and a "service agreement" during the registration process, he had no recollection of ever having signed or received a contract or contract cancellation form from FES.
- 49. Mr. Villarreal stated that after completing his registration, he learned that FES would be repairing his credit through a dispute letter process. FES would send him so-called "dispute letters" that he would sign and send to the three credit bureaus.
- 50. Mr. Villarreal stated that he was enrolled with FES for about two months.

 Over the course of these two months, FES sent him one set of dispute letters. After

he sent these letters to the credit bureaus, they responded that the items he disputed could not be removed from his credit report. His credit score did not improve over these two months. To make matters worse, there was also a "hard inquiry" added to his credit report when FES ran a credit check following his registration.

- 51. Mr. Villarreal stated that on top of his negative experience with FES's credit repair service, he never received any of the agent advertising material he had initially been promised. Fernandez never sent him any supporting material and he also never did anything to help him achieve presidential status as he had previously claimed he would. As such, he was never able to sign anyone up, neither as an agent nor as a credit repair customer.
- 52. Mr. Villarreal stated that he decided to leave FES when he realized that the company had no special relationship with the credit bureaus. He did not need FES to send dispute letters on his behalf—he could send the credit bureaus dispute letters himself, for free. As such, he cancelled his registration. He requested a refund of his initial fee plus the two monthly payments FES had billed him, but FES refused to reimburse him.
- 53. Mr. Villarreal stated that about two years later, in or around December of 2019, he received a phone call from Fernandez, who was still an agent with the company. He claimed the company had changed and was a "different company" now. They had supposedly improved their business practices, which Mr. Villarreal

assumed meant they would now be able to effectively fix his credit. FES even went by a new name now: United Credit Education Services ("UCES"). Fernandez claimed he could get him re-registered as an agent for a cheaper price than the one he had paid back in 2017 thanks to a promotion he was running.

- 54. Mr. Villarreal stated that since he was still desperate to get the bankruptcy off his credit report, he fell for Fernandez's claims and agreed to re-register as an agent with UCES. Fernandez then sent him the same registration link he had sent him the first time. This felt fishy to him considering Fernandez had insisted the company was "different" now, but he went forward with registering. He was charged a \$199 registration fee and an additional \$89 for the monthly credit repair fee, totaling up to \$288.
- 55. Mr. Villarreal stated that immediately following his second registration, on or around December 19, 2019, Fernandez added him to a WhatsApp group chat with about 55 other agents. He ended up following a couple of these agents on his social media accounts, including Instagram. They would frequently post images that showed off a luxurious lifestyle. He recalled seeing some agents post pictures of their Maserati cars while claiming they could afford these thanks to their work as FES agents.
- 56. Mr. Villarreal stated that on or around December 20, 2019, he received an email from UCES asking for his authorization to run a hard inquiry on his credit

report. As mentioned earlier, FES had run a hard inquiry on his credit during his first stint with the company that had negatively impacted his credit score. This all made it appear as though FES/UCES had not changed its business practices at all. It seemed like they were running the exact same credit repair operation as they had back in 2017.

- 57. Mr. Villarreal stated that when Fernandez was initially explaining the agent business opportunity to him, Fernandez had stated that he would be compensated for registering new people into UCES, whether as credit repair consumers or new agents. However, after being added to the WhatsApp, he realized there was more to it. You would also be compensated based on who the people in your downline were bringing in. Your downline referred to the agents you registered with UCES, as well as the agents they then registered with UCES, and so on. You would supposedly receive a percentage of the income your downline generated. Furthermore, the more people and layers your downline had, the higher your agent rank would be.
- 58. Mr. Villarreal stated that this discovery made him realize that Fernandez had lied about FES/UCES being different now in order to rope him back into his downline, which he needed to do to maintain or increase his rank and compensation amount. This led him to cancel his registration with the company for

the second time. He attempted to request a refund just like he had the first time, but FES/UCES once again refused to issue one.

- 59. Mr. Villarreal stated that UCES's refusal to issue him a refund led him to file a complaint against UCES with the BBB on or around January 30, 2021. He requested a refund for all the money he had paid them, both from his first and second time being registered with the company. Following his BBB complaint, UCES refunded him the total amount he paid his second time with the company, but still refused to refund him the amount paid the first time.
- 60. After our interview, Mr. Villarreal forwarded to me several images he had captured from his WhatsApp group and from the various social media accounts of the agents he followed, as well as an email he received from UCES. True and correct copies of some of these images and the email that Mr. Villarreal sent me are attached to this declaration as **Attachment A**.

Interview with Brittaney Key

- 61. On or around October 28, 2021, I interviewed Brittaney Key of Honolulu, Hawai'i.
- 62. Ms. Key stated that on or around early November 2020, she was scrolling through Facebook when she began noticing posts being made by a former classmate of hers named Andrea Hall. These posts spoke about how Hall had started her own credit repair business, as well as her experiences with the business

and random facts about credit repair. The posts would say stuff like "Here's why credit is important: You can get better deals on loans, houses, and cars." Other posts would show off customer testimonials and illustrate how their credit had improved as a result of the service.

- 63. Ms. Key stated that Hall also simultaneously posted about a flexible income-earning business opportunity that had allowed people to go from working 9-5s at Walmart to operating their own schedules. Hall advertised this opportunity as being "work from home. If you had "the drive and hustle" you could turn this work from home opportunity into a full-time gig. However, even if you did not have the time to turn this into a full-time job, the opportunity could still be a good side-gig offer.
- 64. Ms. Key stated that her credit at the time was fine. However, the business opportunity Hall was advertising caught her attention. She was working a retail job and figured she could benefit from earning some extra money on the side. She felt as though this business opportunity could be a good fit for her, so she decided to reach out to Hall to learn more.
- 65. Ms. Key stated that she sent Hall a Facebook message on or about November 3, 2020. Hall immediately sent her a link to a WebinarJam that would discuss this joint credit repair service and business opportunity in further detail.

- 66. Ms. Key stated that she attended the WebinarJam meeting, where she was introduced to a company named "Financial Education Services" ("FES"). During the webinar, financial literacy was discussed, as was the credit repair service. It was revealed that the credit repair service cost about \$80 a month. FES supposedly had attorneys on hand that would take care of writing letters to the credit bureaus requesting that they remove accounts in negative from the credit repair service recipients' credit reports.
- 67. Ms. Key stated that the individuals running the call then began discussing the FES business structure. It was mentioned that agents, who were the ones selling the credit repair service, would be required to register for the credit repair service as well. This led her to drop off the call, since she was not interested in becoming an FES agent if it also required being registered for the credit repair service.
- 68. Ms. Key stated that a little under a year after the matter, she spoke with a friend who was involved in a separate pyramid scheme. Speaking with this friend reminded her of her brief introduction to FES, which inspired her to file a complaint against them with the CFPB on September 19, 2021.

Interview with Glenn Igafo

- 69. On or around February 11, 2021, I interviewed Glenn Igafo of Mililani, Hawai'i.
 - 70. Mr. Igafo stated that in or around 2019, a good friend of his reached out to

him and told him about a credit repair service that a friend of his had registered him and his wife up for. His friend explained that the full credit repair package was called the Financial Education Services ("FES") Protection Plan. The FES Protection Plan would supposedly include access to attorneys who would help one repair their credit, as well as write their will and trust. Overall, the FES Protection Plan included about 11-13 different tools that would help repair one's credit. The friend stated that this credit repair service would improve Mr. Igafo's credit score to 750 points or higher within a year. The credit repair service program cost a one-time registration fee of \$189, followed by monthly payments of \$89.

- 71. Mr. Igafo stated that his friend also explained that FES allowed people to "start their own business" and earn money by registering as an agent with the company and selling the credit repair service to other consumers. A lot of people who registered as agents supposedly made a lot of money quickly. FES had different agent ranks, and his friend claimed that once an agent reached the fourth or fifth agent rank, that was the "sweet spot where you start making a lot of money." His friend claimed that agents were making up to six figures working with the company. The friend also insisted that despite the rank system, FES was not a pyramid scheme.
- 72. Mr. Igafo stated that he was mainly interested in improving his credit.

 Regardless, he figured that it could be fun to work as an agent alongside his friend,

so he ultimately decided to register for both the credit repair service and agent program. He joined under his friend.

- 73. Mr. Igafo stated that upon joining FES as an agent, he attended webinar trainings via Zoom where he learned more about FES. He learned through these trainings that the rank system was based around a point system. Essentially, agents would earn points for registering people with the company, either as credit repair customers or other agents. The amount of points an agent obtained in a given month would determine whether they remained at that rank, moved up a rank, or, in cases of limited output, were demoted a rank. The points were refreshed every month, and agents would receive a one-month grace period for months of low registration. This meant that if one had a successful month in which they registered multiple people, but then did not register anyone the following month, they would remain at their same rank. However, if they also struggled to register anyone the month after that, their rank would be demoted.
- 74. Mr. Igafo stated that he spent a significant amount of time on advertising FES. He was constantly posting about FES on social media, as well as putting up physical fliers around the neighborhood as well. In total, he managed to recruit three people underneath him, which were his sisters and wife.
- 75. Mr. Igafo stated that eventually he decided he wanted to leave FES. When he attempted leaving, he requested a refund, but did not receive it. FES' refusal to

issue a refund is what led him to file a complaint against the company with the BBB.

Interview with Jennifer Grant

- 76. On or around January 13, 2022, I interviewed Jennifer Grant of Bedford, Texas.
- 77. Ms. Grant stated that in or around November or December of 2020, she was chatting with her friend Monica who told her about a credit repair agency she worked with that Ms. Grant would eventually learn was called United Credit Education Services ("UCES"). Monica explained that UCES would repair its customers' credit by sending out dispute letters on their behalf to the credit bureaus. These letters would dispute and remove all negative and delinquent accounts from customers' credit reports. This, in turn, would increase a customer's credit score by up to 100 points, and sometimes even higher than that. Monica told her that the credit repair service, which she was enrolled in herself, had so far improved her credit by 30 points. In addition to providing these dispute letters, UCES also supposedly held credit education classes that its credit repair service recipients could participate in.
- 78. Ms. Grant stated that Monica, who was an agent with the company, offered to sign her up as an agent as well. Monica claimed that for every person an agent

signed up with UCES, the agent would get a cut of their registration fees. However, this offer did not particularly interest her, and so she declined.

- 79. Ms. Grant stated that Monica explained that there would be an initial registration fee for the credit repair services as well as an \$89 monthly fee for every month she continued using the service.
- 80. Ms. Grant stated that she took about two weeks to think it over. At one point during this period, Monica got her on the phone with another UCES agent who told her about all the benefits of the credit repair service. Having Monica connect her with this other agent made the service appear more legitimate to her.
- 81. Ms. Grant stated that at that time, she felt as though anything that could improve her credit score was worth the costs Monica had laid out. She also trusted her friend. As such, after thinking it over, she decided to go ahead and sign up for the credit repair service and called Monica to initiate the registration process.

 Monica asked her to text her personal information to her so that she could register her on the website. This included her Social Security Number, phone number, and email address. She also texted Monica her bank account information so that she could pay the initial sign-up fee. She was billed immediately, which gave her the impression that she was now fully registered and ready to go with UCES.
- 82. Ms. Grant stated that during this initial registration process, she did not recall receiving a written statement called "Consumer Credit File Rights Under

State and Federal Law" or any other disclosure. Moreover, she did not receive or sign a contract or a contract cancellation form. She did not sign anything else for that matter.

- 83. Ms. Grant stated that following her registration, Monica confirmed that she had successfully signed up for the credit repair service. She asked Monica what would happen next, and Monica said that all she had to do at this point was wait for UCES to send her the dispute letters. Monica claimed that UCES would reach out to her first via email.
- 84. Ms. Grant stated that she waited three months to receive these dispute letters without hearing anything from UCES. She never once questioned or doubted whether her registration had been successful because UCES was continuing to bill her their monthly fee. Regardless, she was growing impatient. She first checked in with Monica about the status of her dispute letters about a month following her registration, and then at various points afterwards. Monica repeatedly encouraged her to just wait a little longer.
- 85. Ms. Grant stated that about three months after she had initially registered for UCES, they had billed her the \$89 fee three times, for a total of \$267. This made her decide she was paying too much money for a service that was acting way too slowly. She called Monica and told her that she wanted to cancel her UCES registration. This appeared to spark a new sense of urgency in Monica, and Monica

suggested they call UCES corporate together to inquire about where her dispute letters were.

- 86. Ms. Grant stated that Monica then called UCES corporate and looped her in through a three-way conference call. This conference call was the first time she learned the company's name, "United Credit Education Services." She first spoke with a male company representative who claimed that UCES had followed up with her via email multiple times with instructions on next steps following her initial registration. He also claimed that UCES had attempted to contact her via text message, but that they could not reach her because she had supposedly "opted out" of receiving text messages from them. She checked her email to see if she had accidentally missed their communications, but she did not find a single email from them, neither in her regular inbox nor her spam folder. She also did not have any recollection of having "opted out" of receiving text messages from UCES.
- 87. Ms. Grant stated that since she already had him on the phone, she asked the corporate representative if he could tell her the next steps for registering for the credit repair services. She told him that if he could not provide her with these steps, she would cancel her registration. While they were still on the phone, he sent her an email with a link to the customer portal. The personal information she had sent Monica when she registered was already pre-filled in on the portal. The corporate representative explained she would need to check some boxes on this portal if she

wanted to begin receiving her dispute letters. He then began giving her instructions over the phone about how to proceed. There were a few pages that appeared on the screen which seemed to contain disclosures or terms and conditions. The corporate representative hurriedly asked her to mark the checkboxes and click through the pages without giving her any time to read what she was supposedly agreeing to. His instructions felt very rushed.

- 88. Ms. Grant stated that once she finished registering with the portal, she asked the corporate representative if he could issue her a refund for each month UCES had billed her for their services since they had not sent her the dispute letters or done anything to repair her credit. The corporate representative stated that UCES would not do that because they had tried to contact her regarding the instructions to officially register with the portal. As Ms. Grant previously mentioned, this was a lie because she had not received a single email from them and had never opted out of receiving text messages, at least not to her recollection. She did not understand why Monica had never shared these additional portal registration instructions with her.
- 89. Ms. Grant stated that still on the call, she asked the corporate representative if she could speak with his supervisor. He then transferred her to a female corporate representative who continued to refuse to issue her a refund.

- 90. Ms. Grant stated that after this representative refused to issue her a refund for all the monthly fees UCES had deducted from her bank account, she decided the company's business practices were too shady for her to give their dispute letter process a shot, even though she was now supposedly fully registered. She asked the supervisor to cancel her registration on that same phone call, and she was thankfully never billed by UCES again.
- 91. Ms. Grant stated that after getting off the phone with the supervisor, she noticed she had received an email from UCES informing her that they were going to run a hard inquiry on her credit. She had not knowingly agreed to have UCES run this inquiry. She would not have knowingly agreed to this since having a hard inquiry run on one's credit can negatively affect it.
- 92. Ms. Grant stated that after she cancelled her registration, she looked up "United Credit Education Services" online on Google and came across a plethora of negative reviews that seemed to imply the credit repair service they were running was a scam. People were specifically complaining that UCES did not provide the services it promised and that UCES never sent the consumers their supposed dispute letters.
- 93. Ms. Grant stated that on or around March 3, 2021, she filed a complaint with the BBB with two main intentions: she wanted to get her money back from UCES, but she also wanted to let other people know about the company's shady

business practices. She requested a refund of \$267 in her complaint, representing the three months' worth of monthly fees that UCES had deducted from her account.

- 94. Ms. Grant stated that UCES quickly responded to her complaint and issued her a refund of \$89, worth one month of services. However, they insisted that they would not issue her a refund for the remaining \$178. The BBB gave her 48 hours to respond to the UCES reply, but she did not see it until it was too late. The BBB closed her complaint on or around March 17, 2021, and she did not think it would be worth her time and effort to reopen it. To this day, she has not been refunded her full \$267.
- 95. After our interview, Ms. Grant forwarded to copies of her bank statement showing the fees that UCES had taken. True and correct copies of some of the bank statements that Ms. Grant sent me are attached to this declaration as **Attachment B**.

Interview with Wanda Wilson

- 96. On or around May 5, 2022, I interviewed Wanda Wilson of Loganville, Georgia.
- 97. Ms. Wilson stated that in or around January 2019, she and her husband were seeking to repair their credit when she received a call from an old friend advertising the opportunity to join a company called Financial Education Services

("FES"). This person told her that she was an FES agent. The agent told her that if she signed up for FES as well, she would receive a weekly paycheck as well as benefits that included credit repair programs, life insurance, written will services, and a company car. She was attracted to the lifestyle her friend promoted, such as being able to earn a salary from home and make enough money to retire early or pay off loans and debts.

- 98. Ms. Wilson stated that when she signed up for the program, she was under the impression that she had enrolled with a company called FES. However, as she began receiving emails from the company and further information about the credit repair service (for example, information about letters that would get sent to the credit bureaus), she noticed these materials came from a company called United Credit Education Services ("UCES") and had that name listed on documents and formal communications.
- 99. Ms. Wilson stated that in or around early 2019, she attended an in-person meeting at the home of one of the company executives. FES sales directors, executive vice presidents, and executive directors were all in attendance. She joined FES as an agent by registering in-person during this meeting. The company representatives had brought tablets to the meeting so that they could enroll new consumers and have them sign all of the forms and other necessary paperwork at that meeting. She had to pay a \$288 upfront fee to sign up.

- 100. Ms. Wilson stated that after she enrolled in FES, she began receiving constant phone calls from the woman who had recruited her and another sales director. They were telling her that she needed to get others to sign up for FES as well. She recruited her husband and other friends and family. Her husband also had to pay the \$288 sign-up fee. At one point, she had enrolled more than five people and as many as eight people. She and all her enrollees joined because of the promised weekly payments and potential financial earnings, as well as the company's credit repair services. FES told them that they would remove negative marks from their credit report, such as those from bankruptcies or late student loan payments, even if they had, in fact, filed for bankruptcy or failed to pay off their student loans.
- 101. Ms. Wilson stated that FES provided her with a website and instructed her to set up business pages on social media to sell the company's products, including credit repair packages, as well as to recruit new agents. FES also gave her products like FES car magnets and personalized business cards. She learned after she signed up that the company only awarded the other advertised benefits, like a life insurance policy or company-paid car, after one had been with the company for around 5 years or reached a certain number of recruits.
- 102. Ms. Wilson stated that when she enrolled with FES in early 2019, she was told that agents were required to also have a credit repair account for which FES

charged \$89 per month. FES waived the \$89 per month credit repair fee for agents who recruited five other sales agents in a month. As long as one maintained this five-agent threshold, they didn't have to pay the \$89 per month. When she had recruited her requisite five friends or family to join the company, she received the services for free. However, at one point her enrollees began dropping out of the program, so FES again started charging her each month. The company required that one maintain at least five other sales agents in order to receive the free credit repair services. Between January 2019 and the following August, she paid about two or three \$89 monthly fees for these months because she had fewer than five people signed up below her who were actively participating and selling.

103. Ms. Wilson stated that additionally, once one signed up five people, one could move onto the next level and start climbing the sales ladder. By recruiting more people, one would qualify to receive increasing payments from FES.

104. Ms. Wilson stated that the FES representative who signed her up, as well as the linked materials the agent sent, advertised that FES would pay its agents every week. After she signed up, she learned that FES paid agents based on how many other people they had signed up as agents, so that one made more money and received more perks if they signed up more people. However, once she signed up, she learned that FES only paid its agents if they had recruited at least five agents. FES paid her for signing people up in early 2019, when she was newer to the

program and had five recruited agents. She was motivated to sign people up because she understood that she would receive a greater financial bonus from FES if she enrolled more agents.

105. Ms. Wilson stated that after she signed new agents up, she learned that FES required them to continue recruiting and signing people up. Eventually, during the summer of 2019, being an agent with FES started costing her so much money that she could no longer afford it. She incurred advertising costs because FES instructed agents to get business cards, take professional pictures to advertise on social media, and actively recruit new people. For example, she recalled paying for batches of flyers in her attempt to advertise as they had directed and spending a lot of time trying to recruit new people every day. When her expenses began to outweigh what FES had paid her, she closed her accounts.

106. Ms. Wilson stated that she also stopped being an agent because she became exasperated with the company's relentless pressure to sign up new people. The agent recruiting never ended: the company kept asking her and those she had signed up to sign up more people.

107. Ms. Wilson stated that she received about two payments from FES during her months as an agent. She understood that FES was paying her to sign new people up as FES agents. In total, FES paid her a couple hundred dollars, via direct deposit.

108. Ms. Wilson stated that every morning at 8am, there were call-in meetings over Zoom for herself and other agents. She attended these meetings almost daily for the first three months she was enrolled with FES (early 2019). FES executives would make a speech each morning that often revolved around going out each day to recruit new people and presented on things like income producing activities (IPA) agents should be doing.

109. Ms. Wilson stated that FES also held meetings about once every two months for FES executives and agents. People would travel from out of state for these meetings, which were held at one of the FES executive's houses. These luxurious houses showed her the kind of lifestyle that she felt I could also achieve if she continued to climb the ladder and advance through the ranks by recruiting agents and selling credit repair services. At these meetings, FES executives would try to go through the contact list on her phone and call people to get them to sign up with the company. She never received any training in actually repairing credit at the meetings or otherwise from FES or the agent that initially contacted her.

110. Ms. Wilson stated that her credit repair package consisted of letters UCES provided her for the credit bureaus. These letters disputed various negative marks on her credit reports by saying things like 'this account doesn't belong to me.'

UCES directed her to sign the copies and then mail them to the credit bureaus.

- 111. Ms. Wilson stated that at one point, she got frustrated and called customer service. She could not get a straight answer. When she had signed up, FES told her that it employed attorneys for the company and its agents. However, when she asked to speak with one of these attorneys, she was always told that they were not available.
- 112. Ms. Wilson stated that she was enrolled with FES for seven or eight months. Although she regularly checked her credit report, she did not notice any meaningful improvements to her credit score during this time. Shewould not have enrolled if she had known the company would not repair her credit.
- 113. Ms. Wilson stated that in or around August 2019, when she stopped being an agent, she also closed her credit repair account with FES because she was seeing no improvement to her credit score and she could not afford to pay \$89/month.
- 114. Ms. Wilson stated that in or around the spring of 2020, she requested a refund on the monthly fees she had paid for the credit repair service through the Better Business Bureau. FES told her that they wouldn't issue her a refund because they had paid her several hundred dollars for her work as an agent. However, she paid a total of about \$500 to FES, so she lost money as a result of enrolling with them. She also never received the promised improvement to her credit score. She also never received the agent benefits promoted at the sales meetings and by the

agent who recruited her, such as a company car, a luxury home, or sufficient income to retire early and pay off her debts.

115. Ms. Wilson stated that she would not have enrolled to be an agent with FES if she had known how much they would ultimately charge her in fees and that she would lose money as opposed to earning substantial income.

Interview with Dessie Thomas

- 116. On or around April 26, 2021, I interviewed Dessie Thomas of Albany, Georgia.
- 117. Ms. Thomas stated that on or around late November or early December of 2017, she was scrolling through her Facebook timeline when she came across a post from someone she was not Facebook friends with. The individual had shared another individual's post about some business opportunity related to credit repair. The post included a caption featuring positive accolades about the individual who made the original post, referring to him as their "mentor" and thanking him for helping them accomplish certain goals. It was pretty clear that this mentor was a businessman of some sort, which caught her eye. She had been interested in dabbling in entrepreneurship at the time and was looking for a business she could join to gain some more entrepreneurial experience before launching her own business. She also wanted to find a business mentor that could help her in her

entrepreneurship journey. As such, she decided to reach out to the mentor on Facebook Messenger.

118. Ms. Thomas stated that she messaged the man and told him that she was looking for a business mentor. The mentor then sent her a video about the credit repair service company he worked for, known as Financial Education Services ("FES"). The video provided a snapshot of the amount of Americans currently in debt, as well as how many Americans possess a certain credit score. The video then went on to promote credit repair and FES's business opportunity. The business opportunity being presented was essentially an opportunity to sell credit repair service packages to consumers on behalf of FES as well as to recruit other sales agents. The video explained how much money one could make working as an agent for the company, illustrated by a compensation chart which highlighted compensation rates for the different agent ranks. At higher ranks, one could also receive \$600 monthly payments towards an Audi as well. At a higher level, one could even receive payments towards their mortgage. The video described agents as "credit repair specialists" receiving "financial education training" who would oversee "financial education franchises."

119. Ms. Thomas stated that after she watched the video, she reached back out to the mentor over Messenger. The mentor further explained that FES would help set agents up as if they were developing their own financial education franchises,

and that the opportunity would help them build financial freedom. Agents would be provided with a mentor, receive training and training materials, and officially be deemed "credit repair specialists." At the time, she thought that if she joined as an agent, she would be trained on credit repair and financial education, which were lessons she would then pass on to the consumers she recruited. She also thought agents were the ones directly repairing consumers' credit.

120. Ms. Thomas stated that her mentor also explained that agents were required to register for FES's credit repair services as well, regardless of whether they needed credit repair or not. The mentor claimed that this credit repair service could raise one's score up to 100 points in 45-90 days. If the agents managed to recruit and/or maintain a minimum of five active, paying customers on a monthly basis, their own credit repair services would be provided to them for free. These customers could be new agents or new credit repair consumers. Individuals they had recruited in previous months who were continuing to pay their monthly fees would count under their five. However, if agents failed to bring in the five new consumers, they would be charged an \$89 fee for that month. Agents were not allowed to opt out of this credit repair service. The mentor claimed that agents would have "a team behind them helping to repair consumers' credit." She assumed this meant her credit would get repaired by her mentor.

121. Ms. Thomas stated that the mentor had given the impression that earning

money through FES would be easy. He claimed to have enrolled 14 people into FES soon after joining the company, which was in part made possible by having his mentors back him up and tell him exactly what to say. These claims and the mentor's stories of his early successes with the company gave her the impression that she could earn between \$200-\$500 a month working with FES. As such, after watching the video and speaking with her mentor over Facebook Messenger, she felt that this opportunity with FES would give her an idea of what being an entrepreneur was like, and thus decided she wanted to register as an agent.

- 122. Ms. Thomas stated that the registration cost to become an FES agent was \$288, which she was not able to afford at that particular moment. However, she let the mentor know she was interested in eventually becoming an agent. About two weeks later, in mid-December 2017, she reached back out to the mentor to confirm she was ready to register. He sent her a link to a website where she would complete her own agent registration. She recalled submitting her name, address, phone number, debit/credit card information, and social security number through the link. She completed this registration on or around December 15, 2017.
- 123. Ms. Thomas stated that she did not sign anything by hand during this registration process. She could not remember if she signed anything digitally on the website. She did not recall receiving a written statement called "Consumer Credit File Rights Under State and Federal Law" or a contract or contract

cancellation instruction form. Throughout her time as an FES agent, she had no recollection of ever asking any consumer she recruited to sign any type of form or paper.

- 124. Ms. Thomas stated that she was also not given any estimate on when the credit repair services she would be receiving would be completed. This is because there was no official start and end date for the service.
- 125. Ms. Thomas stated that something she would go on to learn about the registration process is that FES's credit repair services were open to businesses as well as individuals. Consumers could register for FES under their company's name, in which case they would have to submit business-related information such as the company's EIN.
- 126. Ms. Thomas stated that after completing her FES registration, she went through agent training. Agent training consisted of watching pre-recorded trainings and pamphlets available on the FES agent site, known as the "back office," as well as through Facebook lives and Zoom meetings, and conversations with their mentors. As she previously mentioned, she had expected to undergo credit repair and financial education training, but that's not what the actual training consisted of at all. Instead, the training focused on learning about FES and how to best pitch the company in order to recruit new agents and credit repair customers. There was not a single lesson on how to repair credit. She would go on to learn that agents

themselves were not the ones directly repairing consumers' credit. The training lacking any credit repair education was the first thing that made her a little concerned and skeptical about FES.

127. Ms. Thomas stated that the Zoom meetings she previously mentioned were held on a weekly basis. The meetings generally took place on Mondays or Thursdays, and occasionally both. They were held by higher-up agents for their "teams," which basically consisted of their downlines. A "downline" referred to the agents one brought into the company, and the agents those agents brought into the company, and so forth. These meetings were not mandatory to attend, but were highly recommended. Her mentor claimed that successful agents attended these meetings. These meetings were split into two parts. The first part of these meetings was dedicated towards prospective credit repair service consumers or agents. If the agents were pitching FES to anyone, they were encouraged to invite these prospects to the first part of the Zoom meetings, where they would witness a presentation about the benefits of joining the company. The second part of these Zoom meetings was dedicated towards training existing agents. She said these meetings averaged about 15-20 participants.

128. Ms. Thomas stated that she learned through her mentor and the FES trainings that there were different ways that agents could make money through FES. One way that agents could make money was via commission profits from

selling FES's credit repair service to consumers. The registration cost for those interested in purchasing the credit repair service was usually about \$189. This was a one-time fee that you paid during registration, and consumers were then required to pay recurring monthly fees of \$89 for every month they continued using the service. However, on certain occasions, consumers could purchase the credit repair service at a discounted rate of \$139, and sometimes even for as low as \$89. If an agent sold the service to a consumer at the \$189 range, they would pocket \$100 from the sale. Selling the service to a consumer for \$139 resulted in a \$50 profit. Selling it for \$89 would yield a \$0 profit, but would count towards one's five-person-per-month quota. Agents received weekly checks.

129. Ms. Thomas stated that agents could also make profits off of recruiting new agents into FES. One's official FES agent rank determined the amount they would profit off of every new agent they recruited. As an example, Agents, which were the lowest-level ranking agents, would receive \$100 for each new agent recruit. Field Trainers, which were one rank above Agents, received \$160 for new agent recruits. This per-agent figure would increase as one traveled up the ranks. The rank above a Field Trainer was a Senior Field Trainer, then a Sales Director, then Regional Sales Director, Executive Sales Director, Vice President, Regional Vice President, Executive Vice President, and so on.

- 130. Ms. Thomas stated that in addition to commission payments from registering new credit repair consumers and agents, agents would also make a small commission any time an individual they had recruited in a previous month made a monthly payment to FES. She believed this commission was around \$12 per consumer per month.
- 131. Ms. Thomas stated that on top of profits, agents would also receive value points by making a credit repair service sale or recruiting new agents into FES. At FES, an agent's "value" was defined as the combination of monthly-paying credit repair consumers and agents in one's downline. An agent's value points would help determine their rank. One either had to maintain or earn additional value points each month in order to remain at their rank or advance to the next one. Value points would get reset at the end of every month, which is why agents had to ensure that the individuals they recruited into the company remained active and continued paying their monthly payments. Ranks were not permanent; if the people that agents signed up were leaving the company and one was unable to recruit replacements in a given month, then FES would demote their agent rank. Despite the fact that value points got reset after every month, there would be a grace period prior to a demotion for anyone who lost a significant amount of points after a successful month.
 - 132. Ms. Thomas stated that, with respect to the credit repair services, agents

generally had the choice on whether to charge consumers the \$189, \$139, or \$89 price tags. Selling the service at \$189 was obviously ideal since it would yield the highest profit. However, mentors would occasionally encourage their downline to run "sales" in which the price would drop to \$139 or \$89 in order to make the services more financially accessible, which would in turn help agents recruit more credit repair consumers into the company. This was generally done by agents who wanted to collect enough value points to move up to the next rank. Agents would also lower the price of the credit repair service and provide "discounts" in order to recruit consumers who appeared interested in the services but were "playing hard to get."

133. Ms. Thomas stated that even though she did not recall there being a limit on how many new agents one could recruit into FES at any given time, most agents did not place all their new agent recruits directly under themselves. An agent's downline needed to have a certain structure for an agent to be eligible to move up to a higher rank. Simply registering people as agents and collecting value points was not enough to move one up the ranks alone; these newly registered agents also had to then recruit new agents into their downlines for them to be able to rise up a rank. One's rank was, in part, determined by how many levels of downline they had beneath them, which meant that one's agent recruits had to be active and successful FES agents if they wanted a promotion. As such, if a member of one's

downline was not bringing in any new agents, they might have to place a new agent they personally recruited under that inactive agent instead of themselves.

Even though one would not personally earn profits from that placement, it would increase their chances of promotion, and decrease their chances of demotion.

134. Ms. Thomas stated that in terms of optimal downline structuring, her mentor explained to her that she should work on building one leg of her downline at a time. For example, instead of creating three legs of downline with three legs of people (meaning three people would be exactly one agent rank below hers), she was encouraged to build two legs, one of which went an extra level deeper. She put her mentor's advice into practice after she registered three family members of hers into FES. She first placed two of these family members directly underneath her. She then placed the third family member underneath one of the two that were under her. As previously mentioned, having enough value points alone would not automatically result in a promotion. Managing this type of downline structuring was also crucially important.

135. Ms. Thomas stated that agents also would engage in "sponsoring" new agents, a tactic her mentor encouraged her to use. "Sponsoring" meant that one would pay for part or all of a new agent recruit's initial \$288 fee in order to get the recruit to sign up for FES. This practice would help one maintain enough people in their downline to keep their current agent rank. Whether a consumer was required

to pay one back was simply based on the agreement they had arranged with the person they sponsored. However, even in cases where a consumer was not required to pay the agent back, the other agents would claim that by sponsoring new agents, they would "get the money back eventually" simply by having the new consumer in their downline. It seemed to her that "sponsoring" was a widespread recruitment tactic among FES agents.

136. Ms. Thomas stated that after becoming an agent, her mentor, who was now her direct upline, instructed her to write down the names of 50 people she knew. An "upline" referred to the agent that brought one into the company, as well as the agent that brought that agent into the company, and so on. He then provided her with sales scripts, one of which she was supposed to use with the 50 people she'd written down on her list.

137. Ms. Thomas stated that her mentor also sent her an ad template to post on whichever social media accounts she had. The ad was a screenshot of a recycled credit analysis showing that someone's credit score increased about 50 points thanks to FES's credit repair service. She felt uncomfortable posting this screenshot because she did not know the individual whose credit had supposedly increased by 50 points. She did not even know if they were a real FES client. At one point, her mentor encouraged her to post a version of this ad template in which the consumer whose credit had supposedly been repaired had the first name

"Thomas," which was her last name. She listened to her mentor and posted the ad template on Facebook, and many of her Facebook friends assumed that because her name was listed, the ad was referring to her own credit. Posting this ad felt dishonest to her.

138. Ms. Thomas stated that when potential consumers would contact her about FES, her mentor required her to read off the same lines from the same scripts in an effort to get them registered either as new credit repair consumers or new agents. If they were interested in registering, she would get them on a group call with her mentor, who would take over for her and pitch to them the opportunity to join the company. He did this until she felt more confident taking over. On these calls, her mentor would make vague claims about how the consumer's credit could increase by a high amount of points, sometimes even up to 100. He would also tell consumers that their credit score would increase within 45-90 days, which was a direct time range we were trained to advertise. The mentor would also claim that bankruptcies and student loans could be removed from consumers' credit reports.

139. Ms. Thomas stated that even though consumers were free to register themselves on the FES website as she had done for herself, agents were also able to register consumers directly. In order for a consumer to sign themselves up, they would need to receive a specialized link from their agent.

140. Ms. Thomas stated that being an FES agent was very difficult for her in the beginning. She was genuinely under the impression that she would have a role in the credit repair process, but she quickly learned that agents were solely selling this product on behalf of FES corporate and trying to recruit people into their downlines. So if agents were not the ones helping consumers repair their credit, she wondered, who was? She soon learned that FES corporate was supposed to repair consumers' credit through a dispute letter process. She learned about this process after being required to register herself for the credit repair services in order to become an agent. FES would write form-like, undetailed dispute letters for consumers that looked like a high schooler could have written them. These letters would have no specific information in them. They merely listed every negative account entry a particular consumer had present on their credit report and claimed every single one of them was false and thus needed to be closed. FES corporate would send these letters out to consumers who were then instructed to print, sign, and subsequently send them out to the three credit bureaus all by themselves.

141. Ms. Thomas stated that her mentor claimed that the credit bureaus were required to respond to these dispute letters within 30-45 days. Since she knew her mentor had a close relationship with FES corporate, she assumed he got this claim directly from them, which legitimized it to her. However, many of the consumers she registered for the credit repair services did not hear back from the bureaus

within 45 days. Whenever this occurred, she would contact FES corporate on their behalf to inquire about the delay. One excuse FES oftentimes gave was that her customers were not hearing back because they had failed or forgotten to submit their driver's licenses to the credit bureaus along with their dispute letters.

However, FES did not inform consumers ahead of time that they were required to submit their driver's licenses. She would ask FES why they had not communicated this necessity to the consumers, and they never provided her with a legitimate answer. All in all, FES was not being transparent with her or her consumers about the dispute letter and credit repair process, which gradually made her begin viewing the company in a different, less positive light.

- 142. Ms. Thomas stated that in or around February of 2018, she attended an FES convention in Las Vegas, Nevada. She initially learned about this convention through her mentor, who was going to be attending. The convention was discussed quite a bit in the Facebook Live posts leading up to the event. She wanted to attend the convention because of the in-person training that would supposedly occur, as well as the team building exercises and activities. She also wanted to network with FES agents in other cities and regions. There were purportedly going to be opportunities to win cash prizes.
- 143. Ms. Thomas stated that the lessons taught during the trainings at the convention were the exact same as the ones taught during the agent trainings she

had already undergone, in that they lacked any credit repair education and centered on recruitment strategies. The convention was disorganized, and it was a very negative experience for her.

144. Ms. Thomas stated that as a result of her negative experience at this convention, she began to notice various holes in the pitches that agents were making to potential new agents and credit repair consumers they were attempting to recruit into FES. For example, she learned through training, the FES compensation plan booklet, and the recruitment video her agent had sent her that on top of monetary commissions, FES would sometimes gift its successful agents with monthly payments towards an Audi, and sometimes even offer to pay for a house. However, in order to qualify for those monthly Audi payments, agents and their entire downline had to be bringing in a collective \$100,000 worth of business per month. Based on her experiences speaking with other agents, this just simply did not seem realistic for the vast majority of agents, regardless of how hard they worked. However, she noticed that when agents would advertise FES on their Facebook feeds, they would post about these benefits as if they were realistic goals that they had achieved and could be achieved by anybody else with hard work, thereby promoting a false illusion of what one could gain by registering as an agent with the company.

145. Ms. Thomas stated that she learned, as an FES agent, that the credit repair letters did not seem to work and sometime her customers' credit got worse after signing up with FES. As an example, she recalled one customer of hers had a credit score in the 620-650 range when she initially registered for the credit repair service. However, she learned from speaking to the customer that their credit score dropped dramatically lower, to less than 400, after signing up with FES.

146. Ms. Thomas stated that she did not making the money she expected from FES. She began sponsoring the agents she was recruiting, but was losing money in the process. However, she kept doing it because she needed to grow her downline if she wanted to get promoted to a higher agent rank.

147. Ms. Thomas stated that this all led her to became exhausted working with FES. She noticed the "hustle and grind" culture was popular among FES agents, but felt they were taking it to an unhealthy level. Agents would promote the lifestyle of working your "business" all day long with no days off, claiming this was the way you would be successful with FES. Whenever she mentioned to her mentor that she was considering leaving the company, he would ask her, "Do you want to be remembered as a quitter?" He and other mentors would use reverse psychology tactics such as that in order to get agents in their downline to stay with the company. As she discussed above, if their downlines dropped out of the company, this would both keep the mentors from potentially getting promoted and

could make it easier for them to get demoted. At the time, she thought the mentors resorted to these guilt tactics to maintain their downlines.

148. Ms. Thomas stated that because of these growing concerns, around August 2018 she stopped communicating with FES and her mentor, and stopped working her agent business.

149. Ms. Thomas stated that about a month after she had stopped doing agent work, around September 2018, her mentor reached out to her to inquire about her silence. She told him she needed to take a mental health break from FES. The mentor then began apologizing to her for having "failed" her as a mentor and not dedicating more effort towards helping her grow with the company. He suggested she try the company out just a little bit longer. She ended up briefly returning to FES, but once she realized that his intentions were likely self-serving and that he was only guilting her for the purpose of maintaining his downline, she left again for good. She left by calling FES corporate and stating she did not want to be an agent anymore and that she wanted to leave the company for good.

150. Ms. Thomas stated that she ended up filing a complaint against FES with the BBB on August 30, 2019, requesting a refund of \$1,500, which represented the money she had spent sponsoring new agents. She filed this complaint in part because she was fed up with the misinformation FES was spreading to both its consumers and agents and felt something needed to be done about it.

- 151. Ms. Thomas stated that this BBB complaint led an FES upper management employee to reach out to her claiming FES would not refund her because she had generated profits and commissions throughout her time as an agent. They claimed that FES corporate had never encouraged its agents to sponsor people.
- 152. Ms. Thomas stated that even though she was receiving credit repair services through FES throughout her time as an agent, her credit score remained the same the entire time. Despite sending off the dispute letters, none of her negative account entries were ever removed from her credit report.
- 153. Ms. Thomas stated that throughout her nine months as an FES agent, she believed she advanced to either the Field Trainer or Senior Field Trainer rank and generated around \$2,300 total in commissions. The \$2,300 in commissions was below her expectations, as she had initially hoped to make at least \$500 a month working with FES. If this had been the case, she would have generated \$4,500 minimum. Despite these accomplishments, she wished she had never joined FES in the first place. She felt as though the company thrived off misinforming its consumers, which in turn damages the personal reputation of its agents. She lost money as well as credibility in both the community and with long-time friends because of FES and the backhanded practices that the company and its representatives follow, and no amount of money or profits can change this.

154. After our interview, Ms. Thomas forwarded to me several documents including scripts and other marketing materials she received from her mentor and other agents as well as screen captures from the various social media accounts of other agents. True and correct copies of some of these documents that Ms.

Thomas sent me are attached to this declaration as **Attachment C**.

Interview with Cari-Ann Walker

- 155. On or around January 20, 2022, I interviewed Cari-Ann Walker of Pompano Beach, Florida.
- 156. Ms. Walker stated that in or around late 2020 or early 2021, she was scrolling through Instagram when she came across a post advertising a credit repair opportunity. The individual posting had shared something about recently obtaining a new home or car and claiming that "this could be you too," but that one would need to have good credit before being able to purchase their own car or home. The post encouraged those interested in learning more about the opportunity to leave a comment or direct message the user. She did not personally know the user who had posted the opportunity. She saw that her car insurance agent followed the user, which was likely why the post showed up on her feed. Regardless, she did not pay too much attention to these details, as she was desperate for a credit repair opportunity at the time and was curious to learn more.
 - 157. Ms. Walker stated that she scrolled through the user's profile for a little

and saw posts explaining that this credit repair service would remove all negative accounts from one's credit report. She also noticed various posts advertising an opportunity to make money, but she was exclusively interested in the credit repair opportunity.

158. Ms. Walker stated that she eventually decided to reach out to this user via direct message. This individual told her that this program, United Credit Education Services ("UCES"), would help increase her credit score in 6 months-1 year. The individual, who was an agent for UCES, claimed UCES would ensure that her credit score would be good enough to help her obtain the same items she had been advertising in her post, such as a house and car. The agent further explained that on top of credit repair, UCES also provided additional services such as financial education, credit monitoring, and life insurance. These services were supposedly included in the same credit repair package.

159. Ms. Walker stated that the agent followed by sending her a link to the UCES customer portal so that she could register herself for the service. She recalled submitting her personal information on the portal, including her date of birth and social security number. As part of the registration, she recalled signing or approving Terms & Conditions that claimed her credit score would increase based on her own efforts. However, she did not recall signing or receiving a contract or contract cancellation form, or a written document called "Consumer Credit File"

Rights Under State and Federal Law." She paid an initial fee of \$189 to register for the service. The service also had \$89 monthly fees for each month someone remained enrolled with UCES.

160. Ms. Walker stated that after completing her registration, she received an email from UCES informing her that her dispute letters were ready. She had not previously known how her credit was going to be repaired, as the agent had not explained it to her. The dispute letters referenced in this email were just form templates disputing negative entries on her credit report. She was required to print these template letters out, sign them, and then mail them directly to the credit bureaus. These instructions frustrated her, as she was not aware that she was going to have to do all this extra work herself. She did not appreciate that her agent had not made her aware of these steps in their conversation or in the agent's advertising.

161. Ms. Walker stated that she was enrolled with UCES for about three months, after which she noticed that no changes had been made to her credit. This led her to decide to terminate her registration. She called UCES to officially cancel her registration. She cancelled her registration in or around March of 2021 and filed a complaint against UCES with the BBB on March 12, 2021. Following her BBB complaint, UCES issued her a refund for the \$189 registration fee. Unfortunately, UCES never refunded her for the additional two months' worth of

monthly fees she was billed.

Interview with Britt Lowe Smith

- 162. On or around August 6, 2020, I interviewed Britt Lowe Smith of Lawton, Oklahoma.
- 163. Ms. Smith stated that in or around April of 2021, she posted in an entrepreneur Facebook group that she was a member of. She was dealing with a medical condition which was keeping her out of work, and she was specifically seeking help with budgeting as a result. A woman named Naomi who was also in the Facebook group, but who she did not know personally, contacted her through Facebook Messenger in response to the post. Naomi claimed she was an agent for a company called Financial Education Services ("FES"). Ms. Smith asked Naomi if FES would be able to help get her out of debt, and Naomi claimed that FES could improve her credit score.
- 164. Ms. Smith stated that Naomi sent her a link to a Zoom meeting that would teach her more about FES and its credit repair service. In the Zoom meeting, those leading it claimed that those enrolled in the FES credit repair service could see their credit score increase by up to 200 points. They shared testimonials of individuals who enrolled in the credit repair service when their credit scores were between 400-500, and saw it increase up to 600+ and 700+ thanks to FES. They also explained that FES provided will writing and identity theft services. It was

further noted that the credit repair service was technically run under the name United Credit Education Services ("UCES"), despite belonging to the same company as FES.

165. Ms. Smith stated that the individuals running the Zoom revealed themselves to be agents for FES and also spoke about a connected home-based business opportunity in which those enrolled in the credit repair service enrolled other people into the company, both as agents and credit repair consumers, and received commission payments for doing so.

166. Ms. Smith stated that the agents stated the FES charged a \$288 registration fee for those interested in participating in the joint business opportunity-credit repair service. That \$288 fee was comprised of a \$199 initial registration charge, and the \$89 monthly payment for the UCES credit repair service that the agents were required to be enrolled in. Ms. Smith was under the impression that you could not enroll in the credit repair service without also enrolling in the business opportunity, so she decided to register for both.

167. Ms. Smith stated that she reached back out to Naomi, who helped her register for FES the day following the Zoom. She had to provide FES with her name, address, social security number, and email address. During the registration process, she did not receive a written statement called "Consumer Credit File Rights Under State and Federal Law." She also did not receive a contract or

contract cancellation form. She paid the \$288 registration fee using her credit card.

168. Ms. Smith stated that once she finalized her registration, Naomi instructed her to attend mandatory Zoom meetings that exclusively discussed agent logistics and information. During these Zooms, she learned that if she successfully recruited 5 people or more into the company in any given month, the \$89 monthly fee for the credit repair service would be waived for her for that particular month. To rise up the ranks, however, one would have to get those 5 people they registered to then go ahead and register 5 people underneath them. This effectively meant that one had to build a multi-legged downline to be promoted. Your downline referred to the agents you registered with UCES, as well as the agents they then registered with UCES, and so on.

169. Ms. Smith stated that during these meetings, she also learned that one could, in fact, be registered for the credit repair service without also being registered as an agent.

170. Ms. Smith stated that a compensation chart would be shared in these Zoom meetings that highlighted different compensation rates depending on how many agents and credit repair consumers one successfully registered with the company. She recalled higher commissions available for new agent registrations.

171. Ms. Smith stated that during these meetings, there was heavy emphasis on advertising FES. The new agents were instructed to advertise on every social

media platform they owned. Naomi and her agent, Ron, sent her ads that they wanted her to post, and also requested that she create her own ads. These ads would say stuff such as: "Do you want to work from home?", "Do you want to improve your credit score?", and "Make money working from home." Naomi and Ron were very pushy and demanding towards her and told her that her pictures were not good enough and that she was not posting on social media enough.

172. Ms. Smith stated that she was instructed to watch additional training "crash course" videos that would supposedly teach her how to sell people on the credit repair service and business opportunity. Unfortunately, she had issues accessing the videos on the FES website and was unable to watch any of them. There were sales scripts made available to her on the website as well, but she did not feel confident reading from them without obtaining the additional training from the videos. According to the agents on the Zoom, once the new agents began recruitment attempts, they would have to go by the script verbatim and read it off word-for-word.

173. Ms. Smith stated that she was enrolled as an agent with FES for about a month, from April 2021 to May 2021. Over the course of her monthlong enrollment, she felt like her agents were placing an overwhelming amount of pressure on her to sell a product without adequately preparing or training her to do so and were not accepting of the fact that she had a debilitating medical condition

and life outside of FES. She did not enroll anyone into FES during her month as an agent.

174. Ms. Smith stated that she came to learn that the manner in which FES/UCES was supposedly going to repair her credit was through a dispute letter process. UCES would draft form template letters disputing negative accounts on her credit report, and then send the letters to her so that she could print them out, sign them, and subsequently mail them off to the three credit bureaus. She was not aware of this prior to her registration and did not understand why anyone would pay \$89 a month to write these letters if they, as consumers, could just write directly to the credit bureaus themselves. She never actually received the letters that UCES was purportedly going to write on her behalf.

175. Ms. Smith stated that in May of 2021, a customer service representative called her to congratulate her for joining the team. However, by that point, she knew she wanted to leave the company. She did not feel that the credit repair service was something worth paying \$89 a month for, as she could just send letters off to the credit bureaus herself. She also did not appreciate the pressure to enroll a minimum of five new people into the company per month, or the lack of empathy she was experiencing at the hands of Naomi, Ron, and the other agents for her inability to do so. Her struggles in accessing the training videos exasperated as well. For these reasons, she immediately informed the customer service

representative that she wished to cancel her registration with FES. The customer service representative agreed to cancel her registration, but refused to issue her the refund she was also requesting.

176. Ms. Smith stated that FES' refusal to issue her a refund led her to submit a complaint against FES to the BBB on or around May 25, 2021. FES did end up responding to her complaint and refunded her the \$288, but requested that she remove her BBB complaint. She ultimately decided against removing her complaint after reading through the BBB complaints of other consumers alleging that FES had not refunded their payments. She was surprised that FES even has a BBB page to begin with, as she does not feel that their operations are legitimate nor that they are a real company.

177. Ms. Smith stated that after she left FES, Ron reached out to her on Facebook and accused her of being lazy and attempted badgering her to get her to re-enroll as an agent. She ultimately had to block Ron on Facebook.

178. After our interview, Ms. Smith forwarded to me several emails she received from FES. True and correct copies of some of the emails that Ms. Smith sent me are attached to this declaration as **Attachment D**.

PRESERVATION OF ONLINE CONTENT

Web Captures

179. On October 22, 2020, I remotely used the computers in the FTC's Internet

Lab to visit the website with the domain name www.financialeducationservices.com. After reviewing the website, I took screenshots using SnagIt, a software program that allows users to capture a picture of the computer screen, a portion of the screen, or an entire website, and save the image electronically as a PNG file. I also took screenshots using the screenshot feature on Mozilla Firefox. After capturing several pages on the website, I compared the PNG files I saved from Mozilla Firefox and SnagIt to the website and verified that the PNGs accurately reflected the pages of the website I preserved. I then transferred the PNG files via secure file transfer to the FTC's network. I then saved the PNG files on the FTC's secured network, in a folder with limited access. Attached as **Attachment E** is a true and correct copy of webpages from the www.financialeducationservices.com website that I captured on October 22, 2020.

180. On April 8, 2021, I remotely used the computers in the FTC's Internet Lab to visit the website with the domain name www.financialeducationservices.com.

After reviewing the website, I took screenshots using SnagIt. After capturing several pages on the website, I compared the PNG files I saved from SnagIt to the website and verified that the PNGs accurately reflected the pages of the website I preserved. I then transferred the PNG files via secure file transfer to the FTC's

network. I then saved the PNG files on the FTC's secured network, in a folder with limited access.

181. On April 8, 2021, I remotely used the computers in the FTC's Internet Lab to visit the website with the domain name www.creditmyrent.com. After reviewing the website, I took screenshots using SnagIt, and subsequently saved the image electronically as a PNG file. After capturing several pages on the website, I compared the PNG files I saved from SnagIt to the website and verified that the PNGs accurately reflected the pages of the website I preserved. I then transferred the PNG files via secure file transfer to the FTC's network. I then saved the PNG files on the FTC's secured network, in a folder with limited access. Attached as **Attachment F** is a true and correct copy of webpages from the www.financialeducationservices.com and www.creditmyrent.com websites that I captured on April 8, 2021.

182. On October 18, 2021, and October 19, 2021, I remotely used the computers in the FTC's Internet Lab to visit the website with the domain name https://myuwe.net/. After reviewing the website, I took screenshots using SnagIt, and subsequently saved the image electronically as a PNG file. After capturing several pages on the website, I compared the PNG files I saved from Snagit to the website and verified that the PNGs accurately reflected the pages of the website I preserved. I then transferred the PNG files via secure file transfer to the FTC's

network. I then saved the PNG files on the FTC's secured network, in a folder with limited access. Attached as **Attachment G** is a true and correct copy of webpages from the https://myuwe.net/ website that I captured on October 18. 2021, and October 19, 2021.

Social Media Captures

YouTube

183. In December 2021, I preserved YouTube videos related to FES marketing, the FES compensation plan, and the FES/UCES credit repair service on various YouTube channels. I remotely used the computers in the FTC's Internet Lab to visit YouTube.com. I searched for these FES videos using various search terms. Using the Google Chrome web browser, I viewed and navigated through several videos that appeared in the YouTube search results. I identified several videos that had been posted recently and discussed the company in some detail, and downloaded these videos using the application 4K Video Downloader. I downloaded these videos directly from YouTube in an mp4 format that is readily viewable offline. For each video that I downloaded, I also used SnagIt to capture a screenshot of the webpage displaying the video, and subsequently saved the image electronically as a PNG file. I then transferred the video files and screenshot images via secure file transfer to the FTC's network. I then saved the video files and screenshots on the FTC's secured network, in a folder with limited access.

- 184. The video files I downloaded from YouTube in December 2021 are labeled:
 - a. "2021 UCES & UWE presentation.mp4"
 - b. "BEST UWE PRESENTATION.mp4"
 - c. "How to launch your United wealth Education Business.mp4"
 - d. "How to use Social media to build Your United wealth education
 Business.mp4"
 - e. "NEW UECS AND UWE CREDIT REPAIR OVERVIEW.mp4"
 - f. "The Best United Wealth Education Overview. #networkmarketing #uwe.mp4"
 - g. "The Secret to Financial Literacy!!! #uwe #credit #award #winning #850 #uces #protectionplan.mp4.mp4"
 - h. "The secret to residual income and financial freedom!.mp4"
 - i. "United Wealth Education What Is UWE.mp4"
 - j. "United Wealth Education What You Need To Know About UWE.mp4"
 - k. "United Wealth Education Opportunity Overview.mp4"
 - 1. "UWE Presentation w RSD Ms.Kewi & RVP Coach Kev.mp4"

- m. "UWE UCES UNITED WEALTH EDUCATION IS IT A SCAM

 CREDIT REPAIR FINANCIAL FREEDOM FINANCIAL

 LITERACY.mp4"
- n. "VIDEO #3 UWE NEW AGENT LAUNCH EVP DAVID MARQUEZ.mp4"
- o. "What is UWE (UNITED WEALTH EDUCATION) 2021.mp4"
- p. "UWE Presentacion de Negocio y Oportunidad.mp4"
- 185. The screenshots I captured from YouTube in December 2021 that correspond to the videos listed in paragraph 20 are labeled:
 - a. "2021 UCES & UWE presentation.png"
 - b. "BEST UWE PRESENTATION.png"
 - c. "How to launch your United wealth Education Business.png"
 - d. "How to use Social media to build Your United wealth education Business.png"
 - e. "NEW UECS AND UWE CREDIT REPAIR OVERVIEW.png"
 - f. "The Best United Wealth Education Overview. #networkmarketing #uwe.png"
 - g. "The Secret to Financial Literacy!!! #uwe #credit #award #winning #850 #uces #protectionplan.mp4.png"
 - h. "The secret to residual income and financial freedom!.png"

- i. "United Wealth Education What Is UWE.png"
- j. "United Wealth Education What You Need To Know About UWE.png"
- k. "United Wealth Education Opportunity Overview.png"
- 1. "UWE Presentation w RSD Ms.Kewi & RVP Coach Kev.png"
- m. "UWE UCES UNITED WEALTH EDUCATION IS IT A SCAM

 CREDIT REPAIR FINANCIAL FREEDOM FINANCIAL

 LITERACY.png"
- n. "VIDEO #3 UWE NEW AGENT LAUNCH EVP DAVID MARQUEZ.png"
- o. "What is UWE (UNITED WEALTH EDUCATION) 2021.png"
- p. "UWE Presentacion de Negocio y Oportunidad.png"
- 186. Attached as **Attachment H** is a true and correct copy of the YouTube screenshots described in Paragraph 226.
- 187. In December 2021, I was asked by Staff to preserve YouTube videos pertaining an FES agent named Ashton Henry presenting on the Steve Harvey show. I remotely used the computers in the FTC's Internet Lab to visit YouTube.com. I searched for these videos using the search terms "Ashton Henry" and "Steve Harvey." Using the Google Chrome web browser, I viewed and navigated through several videos that appeared in the YouTube search results. I

identified several videos related to the subject at hand and downloaded these videos using the application 4K Video Downloader. I downloaded these videos directly from YouTube in an mp4 format that is readily viewable offline. For each video that I downloaded, I also used SnagIt to capture a screenshot of the webpage displaying the video, and subsequently saved the image electronically as a PNG file. I then transferred the video files and screenshot images via secure file transfer to the FTC's network. I then saved the video files and screenshots on the FTC's secured network, in a folder with limited access.

188. The video files I downloaded from YouTube pertaining to Ashton Henry and Steve Harvey in December 2021 are labeled:

- a. "Fixing Your Credit with Ashton Henry Financial STEVE HARVEY.mp4"
- b. "Get Out of Debt Thanks to Ashton Henry Financial STEVE HARVEY.mp4"
- c. "Protect Your Identity with Ashton Henry Financial STEVE HARVEY.mp4"
- d. "Turn Around Bad Credit with Ashton Henry STEVE HARVEY.mp4"

- 189. The screenshots I captured from YouTube pertaining to Ashton Henry and Steve Harvey in December 2021 that correspond to the videos listed in paragraph 20 are labeled:
 - a. "Fixing Your Credit with Ashton Henry Financial STEVE HARVEY.png"
 - b. "Get Out of Debt Thanks to Ashton Henry Financial STEVE HARVEY.png"
 - c. "Protect Your Identity with Ashton Henry Financial STEVE HARVEY.png"
- d. "Turn Around Bad Credit with Ashton Henry STEVE HARVEY.png"

 190. Attached as **Attachment I** is a true and correct copy of the YouTube screenshots described in Paragraph 230.

Facebook

191. In January 2022, I preserved Facebook posts related to FES marketing, the FES compensation plan, and the FES/UCES credit repair service. I remotely used the computers in the FTC's Internet Lab to visit Facebook.com. I searched for these FES Facebook posts using various search terms. Using the Google Chrome web browser, I viewed and navigated through several posts that appeared in the Facebook search results. I identified several posts that had been recently posted.

After identifying these relevant posts, I took screenshots using SnagIt and subsequently saved the image electronically as a PNG file. After capturing several Facebook posts, I compared the PNG files to the Facebook posts on the website and verified that the PNGs accurately reflected the Facebook posts on the website. I then transferred the PNG files via secure file transfer to the FTC's network. I then saved the PNG files on the FTC's secured network, in a folder with limited access.

192. The screenshots I captured from Facebook pertaining to FES are labeled:

- a. "FB Capture 1.png"
- b. "FB Capture 2.png"
- c. "FB Capture 3.png"
- d. "FB Capture 4.png"
- e. "FB Capture 5.png"
- f. "FB Capture 6.png"
- g. "FB Capture 7.png"
- h. "FB Capture 8.png"
- i. "FB Capture 9.png"
- j. "FB Capture 10.png"
- 193. Attached as **Attachment J** is a true and correct copy of the Facebook screenshots described in Paragraph 233.

<u>Instagram</u>

194. In January 2022, I preserved Instagram posts related to FES marketing, the FES compensation plan, and the FES/UCES credit repair service. I remotely used the computers in the FTC's Internet Lab to visit Instagram. I searched for these FES Instagram posts using various search terms. Using the Google Chrome web browser, I viewed and navigated through several posts that appeared in the Instagram search results. I identified several posts that had been posted recently. After identifying these relevant posts, I took screenshots using SnagIt and subsequently saved the image electronically as a PNG file. After capturing several Instagram posts, I compared the PNG files to the Instagram posts on the website and verified that the PNGs accurately reflected the Instagram posts on the website. I then transferred the PNG files via secure file transfer to the FTC's network. I then saved the PNG files on the FTC's secured network, in a folder with limited access.

195. On occasion, I would have to take more than one screenshot to fully capture and preserve longer posts. In cases where this occurred, I titled the first capture in the sequence as "Capture #," the second capture in the sequence as "Capture at third capture was required, the third capture in the sequence as "Capture at third capture was required, the third capture in the sequence as "Capture at third capture was required, the third capture in the sequence as "Capture at third capture was required, the third capture in the sequence as "Capture at third capture was required, the third capture in the sequence as "Capture at third capture was required, the third capture in the sequence as "Capture at third capture was required, the third capture in the sequence as "Capture at third capture was required, the third capture in the sequence as "Capture at third capture was required, the third capture in the sequence as "Capture at third capture was required, the third capture in the sequence as "Capture at third capture was required, the third capture in the sequence as "Capture at third capture was required, the third capture at th

196. The screenshots I captured from Instagram pertaining to FES are labeled:

a. "Capture 1.png"

- b. "Capture 2.png"
- c. "Capture 2a.png"
- d. "Capture 2b.png"
- e. "Capture 3.png"
- f. "Capture 3a.png"
- g. "Capture 4.png"
- h. "Capture 5.png"
- i. "Capture 6.png"
- j. "Capture 7.png"
- k. "Capture 8.png"
- 1. "Capture 8a.png"
- m. "Capture 9.png"
- n. "Capture 10.png"
- o. "Capture 11.png"
- p. "Capture 12.png"
- q. "Capture 13.png"
- r. "Capture 14.png"
- s. "Capture 15.png"
- t. "Capture 16.png"
- u. "Capture 16a.png"

- v. "Capture 17.png"
- w. "Capture 18.png"
- x. "Capture 19.png"
- y. "Capture 20.png"
- z. "Capture 20a.png"
- aa. "Capture 21.png"
- bb."Capture 22.png."
- 197. Attached as **Attachment K** is a true and correct copy of the YouTube screenshots described in Paragraph 237.

SPANISH-LANGUAGE SOCIAL MEDIA CONTENT

- 198. I read, speak, and write Spanish at the native level and I have used my language skills during my career at the FTC.
- 199. At the instruction of Staff, I reviewed Spanish-language videos and social media content posted by FES agents and provided Staff with English summaries and/or English translations of the following content:

Fernando Ramirez YouTube Video

200. On or around December 16, 2021, I reviewed a video posted to YouTube on October 21, 2020, by YouTube account "Fernando Ramirez Bilingual Entrepreneur," and titled "Negocio Modelo De Casa FES Financial Education Services UCES Protection Plan Presentacion Corta," which translates to "Home

Business Model FES Financial Education Services UCES Protection Plan Short Presentation." The video was captured by former FTC paralegal Celia Garrett on May 24, 2021. (See PX10 at 3.)

- 201. In this video, a man who identifies himself as Fernando Ramirez discussed, in Spanish, the UCES Protection Plan and credit repair service, as well as the FES agent business model.
- 202. In the first minute of the video, Ramirez explains that his message is dedicated to Latinos and Latino immigrants.
- 203. At around the 3:10 mark, Ramirez discussed laws that he says allow consumers to have accounts negatively affecting their credit scores be investigated. Ramirez also spoke about his personal experience increasing his credit score. At the request of Staff, I was asked to transcribe and translate this section, which began at around the 03:11 mark and ended around 03:46:
 - a. Spanish transcription: "...gracias a las leyes equitativas que fueron pasadas por Congreso para que tu puedas poner todos los artículos en negativos bajo investigación. Deja de sentirte culpable y ejerce leyes equitativas que te pueden ayudar a remover cualquier artículo, como una bancarrota, pago tarde, foreclosure, [¿?], cualquier cosa que te está afectando, que fue una ley que yo ejercí, y lo hice por 16 meses,

- donde mi estado crediticio cambio de 25 artículos negativos con 430 puntos en mi crédito, a escalarlo a 749 en solamente 16 meses."
- b. English translation: "...thanks to the equitable laws that were passed by Congress so that you can place all [of your] negative accounts under investigation. Stop feeling guilty and exercise [the] equitable laws that can help you remove whichever account, such as a bankruptcy, late payment, foreclosure, [unintelligible], whichever thing that is affecting you, which is a law I exercised, and I did it for 16 months, where the state of my credit escalated from 25 negative accounts and a 430 credit score to 749 in just 16 months."
- 204. At around the 3:50 mark, Ramirez claims that if FES customers need help from lawyers, there are lawyers available who can sue "collectors" that violate the law, as well as the "agencies" [presumably, credit bureaus] that are not monitoring or supervising what is being reported to them.
- 205. At around the 14:15 mark, Ramirez claims that FES will pay for its agents' automobile and house. At the request of Staff, I was asked to transcribe and translate this section, which began at around the 14:03 mark and ended around 14:46:
 - a. Spanish transcription: (14:03) "...te van a dar lo que es residuales, no solamente de lo que tú vas a referir, si no de lo que va a referir tu red,

aparte de las comisiones. O sea que es tremendo este plan de compensación que tú puedes ejercer, y aparte de eso también van a pagar tu automóvil, van a pagar tu casa, te van a dar bonus en cash, te dan todo tipo de compensación mientras tú te estructures, a medida tu vayas escalando estas gradas que miras [¿?] al éxito, ellos van a irte dando más beneficios para que tú no tengas que pagar por tu auto, por tu casa, y ahorrar todo tu dinero. ¿Qué te parece eso? Es una gran oportunidad que yo le ejercido por 11 años y te digo que estoy muy bendecido. Por esa razón, estamos dando esta información para que tú la puedas compartir con otras personas."

b. English translation: "...they are going to give you what is residual, not only from what you will refer, but from what your network will refer, apart from the commissions. So this tremendous compensation plan that you can exercise, and apart from that they will also pay your automobile, they will pay your house, they will give you a cash bonus, they give you all types of compensation while you structure yourself as you go climbing these stairs that you look at [unintelligible] to success, they are going to give you more benefits so that you don't have to pay for your auto, for your house, and [so that you can] save all your money. How does that sound to you? It's a great opportunity

that I have exercised for 11 years and let me tell you that I am very blessed. For that reason, we are giving away this information so that you can share it with other people."

206. At around the 15:15 mark, an infographic appears on the screen that details different additional benefits of being an FES agent, including a personalized website, virtual office, customer service representatives based out of Michigan to assist customers and agents, weekly deposits (for qualifying agents), life insurance (for qualifying agents), professionally designed marketing materials, commissions, rewards, bonuses, national and regional training events, tax deduction benefits, and "the opportunity to help others."

Instagram Posts

207. On or around January 11, 2021, I reviewed and translated three Instagram posts I captured on January 6, 2021. The Instagram posts and their respective captions contained Spanish text. The Instagram posts are cited in Paragraph 237 of this declaration. The translations I wrote for each picture are as follows. Bolded words, phrases, or hashtags appeared in English on their respective posts:

Capture 6

208. Image

o White square at the top

- Line 1: Agents are needed
- Line 2: Begin your 2022
- o Middle of the post; blue background
 - Line 1: Work from wherever in Puerto Rico and the United States,
 - Line 2: work your own hours,
 - Line 3: Earn extra income
 - Line 4: Spend more time with your family
- o Red paint at the bottom
 - Line 1: Comment agents
 - Line 2: @financialmanagement
- 209. Caption: Give yourself freedom, gain control over your money, repair your credit with us, help others while you repair your credit #uwe

#unitedwealtheducation #relief #credit #repair #youcandoit #getcontrol

#foryou #doityourself #letmehelp #letmehelpyou #foryou #takecontrol

#doityourself

Capture 12

210. Image: Find an additional job that pays for your car, your mortgage, your bills

211. Caption: #unitedwealtheducation #uwe #offers the #opportunity to #educateourselves on #knowledge of #virtual #mode from #home #parttimejob #fulltime, a #finance #business that #helps you to #acquire #financial #freedom to #share the #acquired #goods with your #family, #takeadvantage of the #pandemic experience, we have #acquired more #skills #working and / or #studying the #virtual mode #contactme

Capture 17

212. Image:

- o Yellow title:
 - Healthy financial future
- o White sub-title
 - I can help you eliminate information that is correct, erroneous,
 and obsolete from your credit report
- o Bullets
 - Collections
 - Foreclosures
 - Bankruptcies
 - Judgments
 - Tax liens
 - Medical bills

- Student loans
- Charge offs
- Liens
- Late payments
- o (Note: The remainder of text in the picture is contact information)

213. Caption:

- o Line 1: For the health of your finances
- Line 2: #creditrepair #ficoscore #creditscore #creditbureaus
 #personalfinances #creditrestoration #buildyourcredit #creditreport
 #financesforentrepreneurs #creditandfinances #debts
 #personalfinances #repairyourcredit #digitalbusinessesoftoday
 #financialhealth #financialservices #UnitedWealthEducation
 #moneyandonlinebusinesses #crediteducationfico #crediteducation

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 19, 2022, in San Diego, CA.

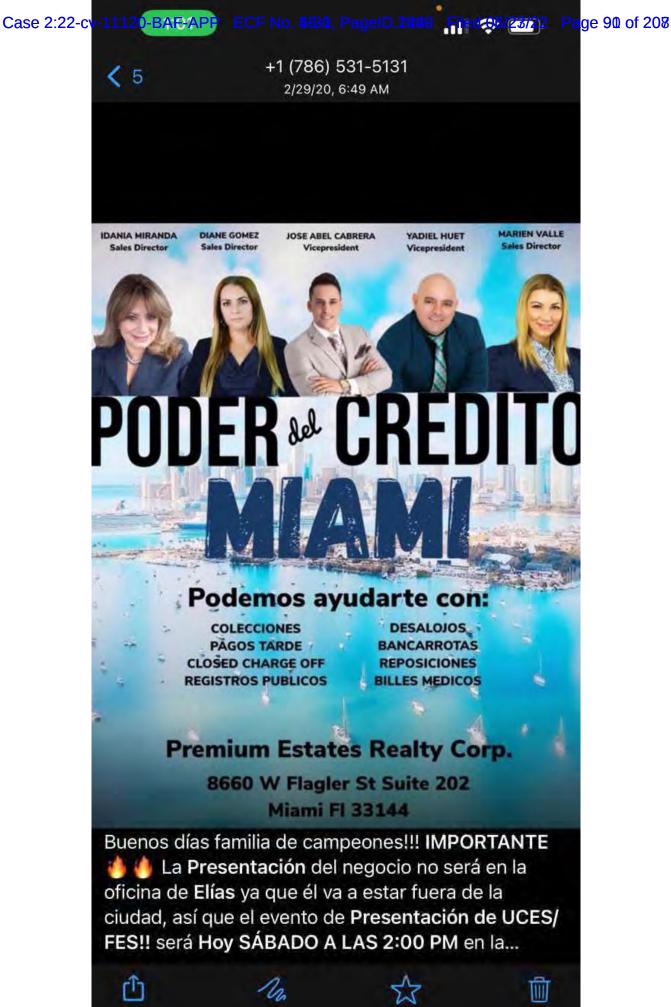
ELENA HOFFMAN

ATTACHMENT INDEX

| | | Page |
|---|------------|------|
| Description | Attachment | No. |
| Documents from Osmel Villarreal | A | 87 |
| Documents from Jennifer Grant | В | 94 |
| Documents from Dessie Thomas | С | 98 |
| Documents from Britt Lowe Smith | D | 207 |
| Pages from webcapture of financialeducationservices.com | Е | 212 |
| Pages from webcapture of creditmyrent.com | F | 218 |
| Pages from webcapture of myuwe.net | G | 264 |
| YouTube screenshots | Н | 352 |
| YouTube screenshots | I | 369 |
| Facebook screenshots | J | 374 |
| Instagram screenshots | K | 386 |

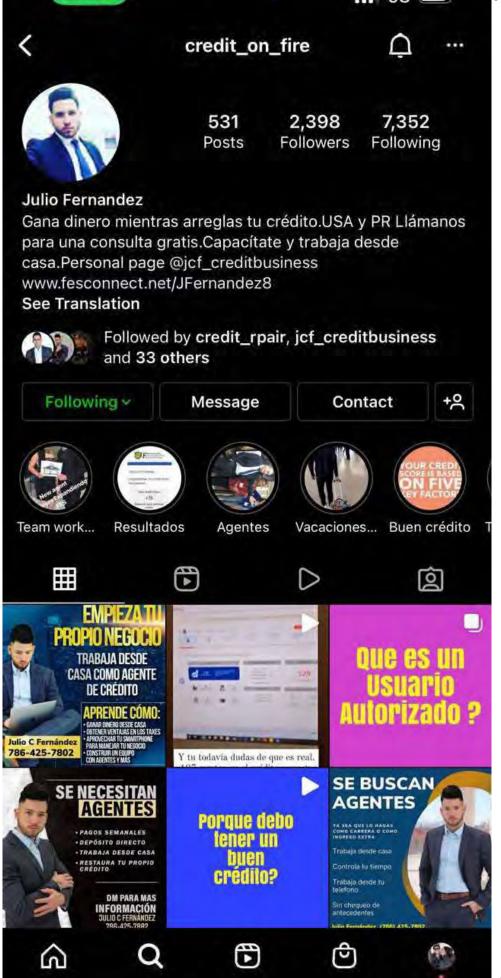
ATTACHMENT A

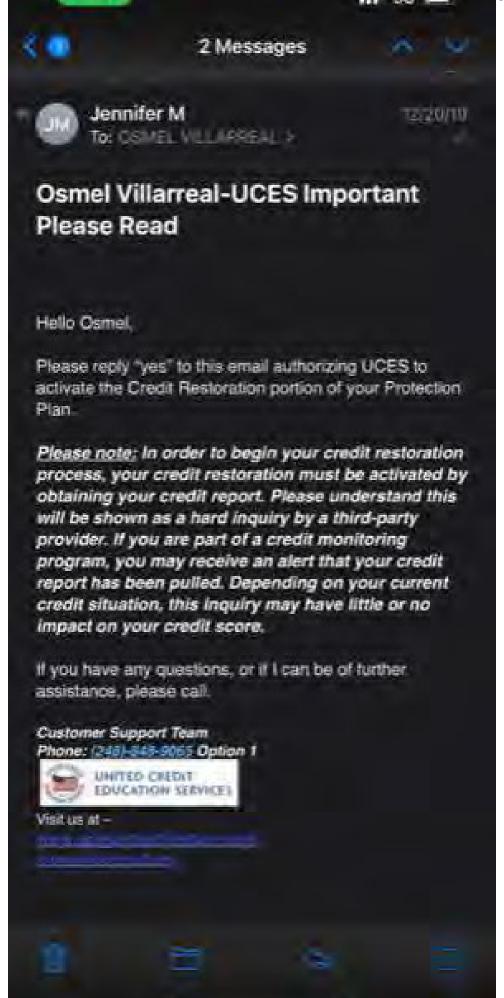












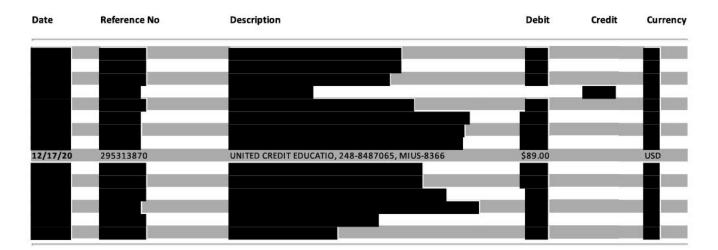
ATTACHMENT B



Please direct inquiries to: smiONE Card Customer Service, PO Box 2489, Carrollton, GA 30112 Phone:1-866-532-9636

TRANSACTION HISTORY





Information About Your Right to Dispute Errors

In Case of Errors or Questions About Your Card Account call us, write us, or email us at the Customer Service contact information above as soon as you can, if you think an error has occurred in your Card Account. We must allow you to report an error until 60 days after the earlier of the date you electronically access your account, if the error could be viewed in your electronic history, or the date we sent the FIRST written history on which the error appeared. You will need to tell us:

- 1. Your name and Card number.
- 2. Why you believe there is an error, and the dollar amount involved.
- 3. Approximately when the error took place.

If you tell us orally, we may require that you send us your complaint or question in writing within 10 business days. We will determine whether an error occurred within 10 business days after we hear from you and will correct any error promptly. If we need more time, however, we may take up to 45 days to investigate your complaint or question. If we decide to do this, we will credit your account within 10 business days for the amount you think is in error, so that you will have the money during the time it takes us to complete our investigation. If we ask you to put your complaint or question in writing and we do not receive it within 10 business days, we may not credit your account.

For errors involving new accounts, point-of-sale, or foreign-initiated transactions, we may take up to 90 days to investigate your complaint or question. For new accounts, we may take up to 20 business days to credit your account for the amount you think is in error. We will tell you the results within three business days after completing our investigation. If we decide that there was no error, we will send you a written explanation. You may ask for copies of the documents that we used in our investigation.



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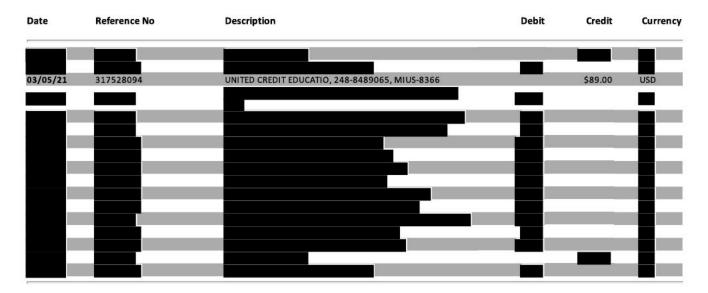
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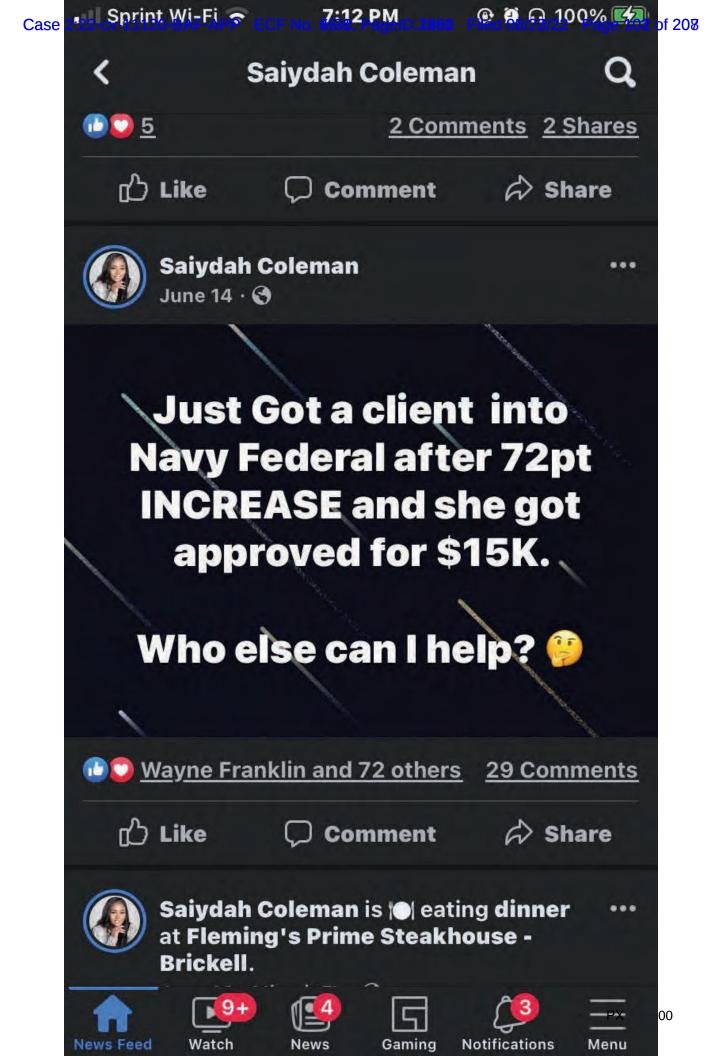
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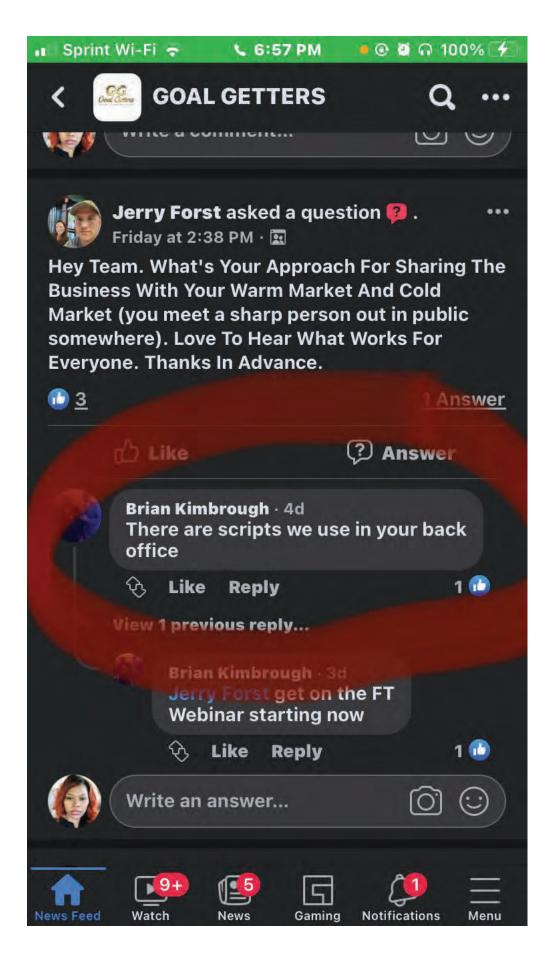
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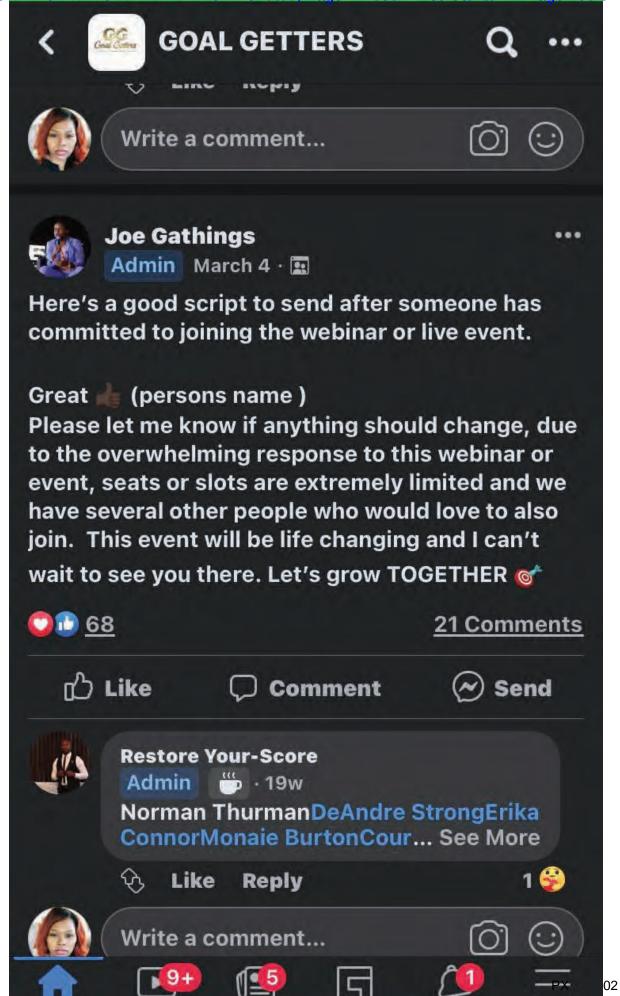
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ATTACHMENT C









Notifications

Menu

News Feed

Watch

Financial Education Services

- Financial Services and Literacy
- **Emphasis on Credit Restoration**
- Founded 2004

03

- Headquartered in Farmington Hills, MI
- A+ Rating With The Better Business Bureau

FL Foundation

Each Protection Plan Membership Donates \$2 to the YFL

Educates Young People Ages 8-18 On the Matters of

- Over 100% Annual Sales Growth
- **Debt Free Company**

Personal Finance





Parimal Naik

PROTECTION PLAN MEMBERSHIP

- Credit Restoration
- Credit Builder
- LifeLock
- FES DebtZero
- MyCare Plan
- Credit Attorney

Services \$99 AND \$89 MONTHLY (NO CONTRACT)

- Smart Credit
- Financial LockBox
- Life Insurance
- And More...



Getting Started 04

\$288 INVESTMENT TO GET STARTED AND \$89 MONTHLY

ONE THE ACTIVATION OF

FES AGENT:

- Protection Plan Membership
- Online Store
- **Build A Team Of Agents**
- · Earn Residuals & Bonuses
- Life Ins Up to 100K
- Return on Investment



The Power of Strive for 5

Annual College Scholarships - YFL Gave Away \$25k in 2014, \$50k in 2015, \$100k in 2016 & \$180k in 2017





Strive For

DIRECT COMMISSIONS



Residual Income **DIRECT RESIDUAL \$12**



\$12 Commission for each PPM Acquired

EXAMPLES:

5x12 = \$60

10x12 = \$120

20X12 = \$240

Your Acquire Customers & Agents FES Does The Rest



Earned Rank and Customers Acquisition Bonuse 08



09

Over 3.4 Million Annually!

Up To \$600 Monthly Audi Payment

Monthly Retirement Bonus

One-time \$10K, \$25K & 50K Cash Bonuses

Up To \$25k



Lifetime Bonuses

10

Training and Support

- · How to Establish Corporate Accounts
- · How to Develop a Marketing Strategy
- · How to Sell Protection Plan Memberships
- How to Manage a Nationwide Organization
- · How to Understand and Maximize the compensation Plan
- . How to Build a Long-Term Residual Income
- · How to Become a Successful FES Leader
- The Right Mindset and Attitude for Success with 103





THE ALLIANCE 3 WAY CALL SCRIPT

Piquing: I partnered up with some very successful entrepreneurs who's launching a huge credit repair franchise. They did 30 million in sales last year And they are projected to do 50 million in sales this year. Do you know anyone with less than perfect credit or who wants to add another source of income?

- 1. Have prospect watch protection plan video (www.myfesconnect.net/yourusername)
- 2. Quick story what you do prior, why you started, success your having(60 seconds max)
- 3. Proper Edification:
 - a. Let me introduce you to Mr./Mrs._____
 - b. Very busy but I can get them on the line for a quick minute
 - c. Has 100% of the information
 - d. Very successful
 - e. Leading the expansion
 - f. Working personally with me
 - g. Hold on while i try and get Mr. or Mrs. On the line
- 4. "Mr./Mrs._____? I just wanted to thank you for taking the time to talk to (prospects). (Prospects), this is Mr./Mrs.____.....
- 5. NOW MUTE YOUR LINE AND LISTEN!

3 WAY CALL SCRIPT FOR EXPERT

HI (NAME) nice to meet you over the phone.

- **1.** What do you do for work? (wait for answer)
- **2.** Full time or part time? (wait for answer)
- **3.** How do you like what you do? (wait for answer)
- **4.** Great let me give you a quick rundown of what we do. I work with a company that's expanding in the area and we deal with Credit Repair and Personal Finances. As you know the economy is becoming more reliant on credit each & every year from purchasing a car, home, to getting cell phones, utilities and even getting a job.
- 5. We are looking for a few professionals that would help assist our leadership teams as we grow into more locations. We have part time and full time income positions available.
- 6. Now let me ask you a question (name), do you know anyone with less than perfect credit?
- 7. Great, so all you will be doing is marketing our credit program connecting the clients to the program and the company does the rest.
- 8. To become a Broker there is a one time investment of \$288, with that you also become a Protection Plan Member so the company will help YOU Rebuild, Repair, and Protect your own Personal Credit for \$89 a month. The benefit is once you acquire your first 5 clients you not only make your ROI but a \$312 profit and they waive the \$89 a month so you're now in business for FREE. which most new agents do in their first 30 days!

- 9. Let me explain how this works, You will earn \$100 commission from every client you enroll weekly and \$12 a month when those clients pay their monthly \$89. The great news is there is no limit to how many clients you can enroll. So example if you got started today and we helped you enroll 5 clients by saturday you would earn a check for \$500 the following Thursday. Does that make sense?
- 10. Like real estate you can choose to build a team of agents and earn \$100-\$550 commission from their clients as well as \$3 a month when their clients pay their monthly.
- 11. I don't want to complicate it it's very simple you acquire clients, you get paid! The company does the rest.

Close Sequence

- 1. Does that make sense?
- 2. So let me ask you (name) what do you like most about what you hear?
- 3. Do you see an opportunity for yourself?
- 4. Great, let's get the paperwork out the way
 - a. Handle objections
 - b. Fill out online form and get them registered!
 - c. Schedule time for launch

d. Plug them into The Alliance (facebook group, telegram, text alerts)

,



5-5-5 Success Formula For Prospecting and Recruiting

- > 5 People a day
- > 5 Times a week
- > 5 Question Close

Here's the 5 Question Close:

For Prospective Customers:

- 1. What negative items on your credit do you need to have removed?
- 2. Are you trying to make a major purchase like a car, home or trying to get a job?
- 3. Ok we can clear that up for you, we do a hard pull and dispute every negative item on a client's report that's why it's such a quick turnaround. Customers typically start seeing results in 45-90 days with us.

All we ask is that while we are working on your credit do not apply for any new accounts . We don't want to interrupt any progress to increasing your credit score okay?

- 4. It's \$188 to get started and \$89 a month for however long you want the service. It's not a contract, however we recommend that customers stay on the service for a minimum of 4-6 months. When are you looking to make it official and get started?
- 5. If they say "I wanted to get started but it will be on this date" Say ok typically what we do in your case is allow our clients to do a pre application then we will process the application on the date you choose. Do you want to take advantage of that? (At this point, take a pre-application)

For Prospective Agents:

- 1. Did you take a look @ the information to the end (Prospecting Tool you are taught to use)?
 What stood out the most to you?
- 2. Why do you need (whatever answer they give) or Why is that important to you now?
- 3. I can understand that (relate to a story or testimony from your product or service)
- 4. I have a question...are you coachable?
- 5. OK sounds like you are ready to get started, which package did you want to get started get?



LET'S GET STARTED

ACTIVATE YOUR SERVICES

- 1. Email your documents to FES at Documents@myfes.net
 - Documents: Picture ID w/correct address & SS Card
 - If address does not match send utility bill w/correct address
 - Clear Picture from phone of documents is accepted
- 2. Access your services at www.fesprotectionplan.com
 - Login username YOUR EMAIL
 - Login password LAST 4 DIGITS OF YOUR SSN



Credit Restoration - **1.** click access and they will prompt you to agree to terms. **2.** identity verification process.

Smart Credit – 1. click access and then click the link that says not a member? Sign up now! 2. Scroll down and you will see the two plans and it will say \$0 monthly click on the sign up now button next to it. 3. Fill out the information they will charge you a REFUNDABLE \$1 to just verify your identity. 4. After you have registered download the app and login. Track your score monthly!

Lifelock -1. click the Activate Your Service button on top right. New clients Require process time of up to 15 days after clicking the button.

Other Services – click access and follow the sign up instructions.

Need Help or have questions concerning your services?

Contact FES (248) 848-9065 then choose option below

Customer support - option 1 customersupport@united-credit.org

Payment dept – option 4 paymentservices@united-credit.org

ID documents – option 3 documents@united-credit.org

-

CREDIT RESTORATION PROCESS

Step 1. submit your documents and activate your services. FES will draw up your **DISPUTE LETTERS** for all 3 bureaus. and mail them to you within **7-10 business days**. (if you do not receive your letters call FES 248-848-9065)

TRICK: Call FES 248-848-9065, option 3. and have them email your dispute letters to you the same day as long as you call 30 minutes after you have submitted your docs and before 5pm mon-fri. print them sign them and mail them out

Step 2. Once you receive your letters in the mail sign them anywhere next to your name on each document and then mail them out to the address listed on all three letters.

Experian Mailing Address

Experian National Consumer Assistance Center P.O. Box 4500 Allen, TX 75013

TransUnion Mailing Address

TransUnion Consumer Relations P.O. Box 2000, Chester, PA 19016 2000

Equifax Mailing Address

Equifax Credit Information Services, LLC P.O. Box 740241, Atlanta, GA 30374

Step 3. The creditors have 30 days to respond from the date they receive the letters. So 30-35 days from the day you mailed out your dispute letters you shall receive your results from all three bureaus. (they will come in separate envelopes). Once you have received your results mail them to **FES PO Box 130 Farmington, MI 48332** or scan your reports and email them to **reports@united-credit.org**

ESTABLISHING CREDIT

How do you know if you need to establish credit?

- You have No or less than 3 Credit Cards, Secure Credit Cards, or installment loans such as Car loan, student loan or mortgage.
- You had any of those and they are now in collections and or closed accounts.

*Here is a list of a few options below remember everyone is different so some of the options may work better for some than others and vice versa.

Step 1 Know your credit score is & what it ranks to creditors.

Step 2 Choose the best option for you based on your score and where you rank on the chart to the right.



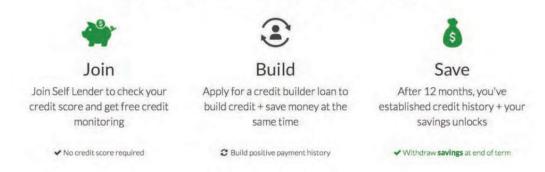
POOR TO FAIR CREDIT the recommendations are to get:

- 1. **SECURED CREDIT CARD:** a secured card is a type of credit card that will require a deposit of a specific amount, usually \$200-\$500.
 - POOR SCORE Open Sky Secured Credit Card (soft pull)
 For more information visit: https://www.openskycc.com/
 - FAIR SCORE Capital One Secured Credit Card (hard pull)
 Capital One Secured Credit Card
 First National Bank Secured Credit Card (hard pull)

You can also get a secured credit card from the bank you currently bank with.

2. SELF LENDER: http://slflndr.com/cw

How Self Lender Works:



- 3. **SHOPPING CART TRICK AKA SCT:** The shopping cart trick, also known as the soft pull trick, is a clever method that allows people with bad credit to get a credit card. The shopping cart trick relies on the fact that many websites will pre-approve you for a credit card during the checkout process without actually checking your score. When you opt in, you are in essence registering yourself in the system of the creditor which makes credit approval faster without the hard inquiry.
 - First step is to opt in at https://www.optoutprescreen.com/?rf=t
 - Make sure you fill out all the information as it appears on your credit report. (address, name, number etc)
 - Wait 2-3 weeks for your info to be registered into the system!!!!
 - Once you are ready, clear your internet browser's history & allow pop ups. (Each internet browser client is different on how to accomplish this, please search google for instructions.)
 - There are dozens of websites that have been reported that works with the SCT, but the websites with the most reported success are as follows:
 Victoria Secrets
 JD Williams
 Fingerhut

- Go on any of the above websites & add items to your cart. It is advised to not add more than \$300.00 to your cart.
- Check out as a guest & input all personal info exactly as it is on your report.
 Do not allow to autofill and enter info slowly has been known to help.
- If the SCT is successful a pop-up message of pre-approval will appear before
 you are required to input payment information. Accept the offer and input
 all your information along with the last four digits of your SSN. This will be a
 soft pull and will not show up on your credit report as a hard inquiry.
- DO NOT BUY ANYTHING! Empty out your cart and wait until your credit card comes in the mail. Below are all the retailers that have been reported to work with the SCT. Some have higher success rates than others.

Use this at your own discretion, but remember the goal is to acquire new credit lines so that you can boost your credit score without the hard inquiry credit score reduction or hard inquiry log on your credit report.

Comenity Credit Card List: The following stores have a Comenity store credit card offer, and have been tested to work with the shopping cart trick. To start, select a few off the list that you want, and save the websites for later. I always recommend only focusing on three sites at a time, and if they fail, moving on to three more.

| Abercrombie & Fitch | Ann Taylor | Bath & Body Works |
|---------------------|--------------------|-------------------|
| Brylane Home | Buckle | Coldwater Creek |
| Express | Gamestop | HSN |
| J.Crew | Jessica London | JJill |
| King Size Direct | Loft | Motorola |
| MyPoints | New York & Company | One Stop Plus |
| PacSun | Romans | Sportsman Guide |
| Total Rewards | Victorias Secret | Wayfair |

FAIR CREDIT TO GOOD CREDIT the recommendations are to get:

- Capital One Platinum or QuickSilver (hard pull) Capital One
- Credit One (hard pull) Credit One
- Store Cards Walmart, Target, Sears, JCPenney etc... (hard pull)
- Bank Cards Chase, Bank of America, Wells Fargo etc... (hard pull)

You can go to each of these creditors website to research their information.

Very Good to Excellent credit the recommendations are to get:

- Discover it
- Amex (American Express)
- Barclay

You can go to each of these creditors website to research their information.

SOME OTHER OPTIONS:

- UNSECURED/SECURED LOAN FROM YOUR BANK
- CAR LOAN
- ADDED AS AUTHORIZED USER ON SPOUSE CREDIT CARD IF THEY HAVE GOOD CREDIT AND ARE RESPONSIBLE
- RENTAL KARMA

If you already have Credit cards you can ask for an increase instead of opening more accounts. The increase if granted will help plenty!

Helpful tip: it is very good to have a DIVERSED portfolio of credit lines Ex: One Credit Card, One Secured Credit Card, One Department Store Credit Card, One Installment loan. And not having 5 secured or unsecured cards instead.

TIPS

Remember, while on the road to building credit, you must learn new healthy habits and break old unhealthy habits. Don't over extend your finances once you start to acquire new and larger lines of credit. Keep all good accounts in good standing. Keep all payments current and avoid late payments at all costs. Make payment arrangements with your credits if you have to.

Keep credit usage below 30% across all accounts. The lower your credit utilization is the faster your score will rise.

Avoid having too many new credit inquiries on your credit report. Go to the website Credit Boards/Credit Pulls and input the new creditor's name you are interested in apply for new credit with. This website is a great tool to find out the fico scores of those who received approvals and those that were denied. Using this tool can give you a bird's eye view on your possible chances of being approved or denied. It is very important to make sure if you are going to have a hard pull on your credit, you are going to be approved.

Always take note of the difference between your Vantage Credit Score and your FICO Credit Score. Your FICO score is used by over 90% of creditors.

Avoid applying for car loans at dealerships. Get preapproved at your bank, or local credit union. Also, Capital One has a very easy car loan approval process that is almost headache free. You are pre-approved without the hard inquiry and only after you've chosen the car of your choice will a hard credit pull be done.

Keep abreast on your credit report. Download the smart credit app on your phone and track often. It is in your best interest to know as soon as possible when certain changes occur on your credit report.

2/23/2018

Platinum Prestige MasterCard® Secured Credit Card

Application Complete | First Progress



Congratulations!

You've chosen a great Secured Card and completed the online application process.

information is required. Your refundable deposit is being transferred to your new Security Deposit Account, and you should receive your new credit card by mail within ten business days. You can save a link to our Application Status Page now by You will receive a confirmation email with a link to our Application Status page, and we will contact you if any additional clicking here. (https://www.firstprogress.com/application/status/TKLZXH8YVHN2U3MWZHMJDJYT) Please note that as disclosed at the time of application, the Annual Fee will be assessed immediately upon approval for a new account, regardless of whether or not the card is activated or used to make purchases.

The First Progress Platinum MasterCard® Secured Credit Cards are issued by Synovus Bank, Columbus, GA, member FDIC

Privacy Policy (/pdfs/first_progress_privacy_policy.pdf)
Deposit Agreement (/pdfs/first_progress_deposit_agreement.pdf)
Cardholder Agreement

Pricing Tables
Online Privacy Practices (/online-privacy-policy)
Website Terms and Conditions (/terms)

FIRST PROGRESS

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Johnson City, TN 37615-9053

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https://apply.firstprogress.com/app-complete

Client lead Scripts:

Save these in your notes on your phone so you have easy access to them for copy and paste

SCRIPT 1-

Hello, it's nice to connect with you. Tell me, what exactly are you looking to get done? Are you trying to get a car, home or negative items deleted? or refinance?

Wait for answer then follow up with this text in full:

Ok Great. The process is pretty simple, We leverage the Fair Credit Reporting Act. Based on the Act we are able to dispute any negative items on your credit report. We pull your credit to do a detailed analysis and whatever is negative on your report will be disputed to be removed or updated to reflect paid as agreed at the same time with all 3 credit agencies, bankruptcies, foreclosures, student loans, medical bills etc. By law the credit bureaus have 30 days max 45 to respond so Customers start seeing results in just 45-90 days with us.

You will also get your own customer portal to track your progress every step of the way and about 12 other additional services at no additional cost which includes but are not limited to:

- Identity theft protection
- Discount shopping and travel
- 24/7 credit monitoring
- 24/7 access to a free credit attorney
- a Will, Trust and Power of Attorney
- And much more!

It's \$188 to get started. Then it's just \$89 every month after for however long you want the service. It's not a contract, however we recommend that customers stay on the service for about 3-6 months. We have an A+ rating with the BBB and 100% Satisfaction guaranteed.

How soon are you looking to get (whatever their reason was to get their credit fixed)?

Okay we can get to work right away. I will send you the enrollment link, once you are in the system you can send me a text message and i will forward you the instructions so we can expedite the process.

Important: after the client enrolls send them the "NEW CLIENT INSTRUCTIONS" locate at

the bottom of this document

<u>SCRIPT 2-</u> When responding to a message on Facebook or via text message for a client simply send this text in full: (CHANGE THE LINK TO YOUR CLIENT ENROLLMENT LINK)

Good Day,

Thank you for contacting me about repairing your credit.

The process is simple:

- · We pull your credit report from all 3 credit bureaus
- · We dispute all the negatives items on all 3 reports at the same time
- You will start seeing results in 45-90 days
- It's only \$188 (one time setup fee \$99 & Monthly Fee \$89)
- You can cancel at anytime with no penalty

To enroll, go to https://www.financialeducationservices.com/proplan99.aspx?rid=Ismg

Once you register email a copy of your driver's license and social security card to

documents@united-credit.org

Please allow 7-13 business days to receive your documents.

Sign and Mail your documents to the 3 bureaus listed.

To access your account go to www.fesprotectionplan.com Username- Your Email Password- last 4 digits of SSN

Feel free to call if you have any questions.

Disclaimer: We do receive several emails and phone calls a day. Please allow 24-48 for a response.

NEW CLIENT INSTRUCTIONS:

Welcome to our credit restoration program

Email documents here

Documents@myfes.net

Login here go to life lock and activate your identity protection program

http://fesprotectionplan.com

Username is your email

Password is last 4 of social

Documents Are a picture of your ID and social to the email above.

•Must watch this customer video
https://myvideo.vids.io/videos/d49bd1ba1919e1c45c/new-customer-video-mp4

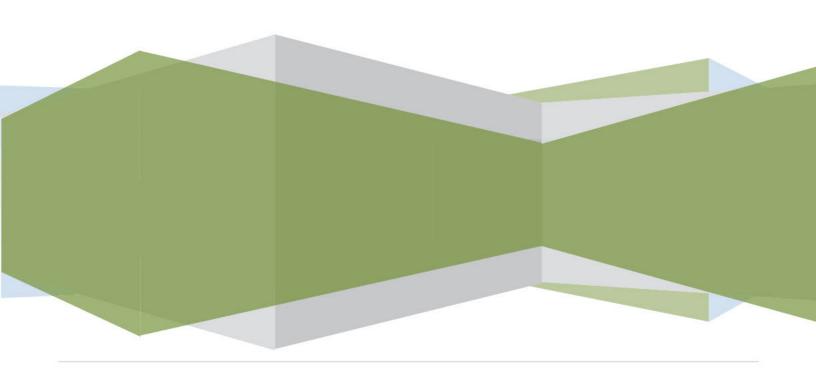
Feel free to call or email if you have any questions.

Disclaimer: We do receive several emails and phone calls a day. Please allow 24-48 for a response.



Financial Education Services

Compensation Plan Overview



Compensation Plan Contents

| FES Protection Plan | 2' |
|--|----|
| Direct CommissionP | 3 |
| Split Payment GuidelinesP MyCare: Pricing Structure, Guidelines and Commission Payout | ۰4 |
| Level Overrides & CAB Bonus: Part 1P Guidelines, Protection Plan Sales, Standard Agent Membership | '5 |
| CAB Bonus: Part 2 | 6 |
| Direct Deposit, Commission Checks & Bonus Volume | 7י |
| Credit My Rent & International Bancard CommissionP | 8' |
| Title Qualifications & Infinity Bonus | 9 |
| Infinity Bonus & Generation Bonus | 10 |
| Medallion Club Qualifications & RewardsP | 11 |
| R&R Club Qualifications & RewardsP2 | 12 |
| Compensation Terminology P2 | 13 |

FES PROTECTION PLAN: SET-UP FEE

The set-up fee for FES Protection Plan customers is \$99. During the enrollment process, agents have the option of reducing the setup fee to \$49 or waiving the set-up fee entirely. Discounting or waiving the set-up fee is offered as a friends and family discount or multiple sale discount.

The enrolling agent will have the option of keeping a direct commission or having it pay out to the placement sponsor, if they decide to place that sale under an agent on their team.

Sales that include the set-up fee must be placed by the following Monday by 5:00 PM, EST or the direct commission will automatically pay out to the enrolling agent.

OPTION 1: RESIDUAL

If you have waived the set-up fee and choose the Residual option, you will receive the \$12 commission the following week and every month thereafter, as long as the customer has made their payment.

When a set-up fee is charged, and the agent has selected the residual pay option, the \$12 monthly commission will be withheld for the first three months. When the customer makes the fourth payment, the residual commission for that month and the previous three months will be released, paying the total of \$48 to the agent. The residual commission will be \$12 monthly thereafter.

After 70 days, if the sale has not been placed under another agent, it will no longer appear in the holding tank, will become an automatic Opt Out and a \$12 Direct Commission will begin to be paid.

OPTION 2: SPONSOR PLACEMENT

Agents have 70 days to place their FES Protection Plan customers to trigger a CAB Bonus or enhance their organizational structure for title requirements. If the sale is placed, the \$12 residual commission will start paying out upon receipt of the customer's fourth payment.

Enrolling Agents who choose to place these customers will relinquish Direct Commission for their customer's first three payments. If the placed customer becomes an Agent, they will automatically be placed back under the Enrolling Agent. At this time, the Enrolling Agent now has another 60 days to place the Agent, but must also replace the customer where the sale was originally placed if it falls within the 70-day time period. If the customer is not replaced, a retraction will be taken.

Sales for new agents who are within the 70-Day CAB qualification period will not appear in the holding tank until the CAB is generated.

FES PROTECTION PLAN: PERSONAL SALES VOLUME

Personal Sales Volume is the total dollar amount of commissionable services sold by an agent. With a FES Protection Plan Customer Sale, your Direct Commission is based on the \$89 payment, while receiving the benefit of an increased PSV. The \$200/\$100 PSV on your \$89 sale will help you achieve and maintain your Titles and Promotions, while allowing you to trigger your CAB Bonuses faster.

| First 3 Payments: FES Protection Plan Customer Memberships | | | | | |
|--|---------|----------|--|--|--|
| Customer Payment Direct Commission Personal Sales Volume (PSV) | | | | | |
| Customer's First \$89 Payment | \$12.00 | \$200.00 | | | |
| Customer's Second \$89 Payment | \$12.00 | \$100.00 | | | |
| Customer's Third \$89 Payment | \$12.00 | \$100.00 | | | |

Direct Commission

Direct commission is paid for all product sales to the sales agent that directly submitted the sale, whether or not they are Active at the time of sale. Commissions are paid Thursday for the previous week's business, beginning Sunday through Saturday at midnight.

| Product | FES Protection Plan \$99 Set Up + \$89/M | FES Protection Plan Discount Set Up Fee \$49 + \$89/M | FES Protection Plan \$89 / Monthly | Corporate Account FES Protection Plan… |
|---------|---|---|---------------------------------------|---|
| Price | \$188 \$89/Month | \$138 \$89/Month | \$89/Month | \$49/Month |
| Direct | \$100.00* | \$50.00* | \$12.00** | \$6.00 |
| Level 1 | \$3.00 | \$3.00 | \$3.00 | \$2.00 |
| Level 2 | \$3.00 | \$3.00 | \$3.00 | \$2.00 |
| Level 3 | \$3.00 | \$3.00 | \$3.00 | \$2.00 |
| Level 4 | \$3.00 | \$3.00 | \$3.00 | \$2.00 |
| Level 5 | \$2.50 | \$2.50 | \$2.50 | \$1.25 |
| Level 6 | \$2.25 | \$2.25 | \$2.25 | \$1.00 |

^{*}One-time direct payout

^{***} FES Protection Plan: Corporate Financial Benefit Package commission is paid on the 4th week of each month.

| Product | MyCare Plan | MyCare Plan | LifeLock | LifeLock | UltraScore |
|---------|-------------|-------------|-----------|-------------|------------|
| Price | \$499 | \$399* | \$99/Year | \$9/Month** | \$149 |
| Direct | \$150.00 | \$100.00 | \$22.00 | \$1.75 | \$40.00 |
| Level 1 | \$24.00 | \$15.00 | \$3.50 | \$0.25 | \$5.00 |
| Level 2 | \$19.00 | \$11.00 | \$3.00 | \$0.20 | \$4.00 |
| Level 3 | \$14.00 | \$8.00 | \$2.00 | \$0.20 | \$3.00 |
| Level 4 | \$9.00 | \$7.00 | \$1.00 | \$0.10 | \$3.00 |
| Level 5 | \$9.00 | \$7.00 | \$1.00 | \$0.10 | \$3.00 |
| Level 6 | \$5.00 | \$4.00 | \$0.75 | \$0.10 | \$2.00 |

^{* \$399:} Promotional price for multiple sales.

^{**}Direct payout on the FES Protection Plan only applies to Personal Customer Sales.

^{**}LifeLock monthly commissions are limited to one year.

Split Payment Guidelines

Customers can enroll in MyCare Plan on an installment plan for \$499 or \$399 (promotional price/group discount). This option is only available to customers using a credit card, debit card or checking account as their payment method. Half the payment will be due at the time of enrollment and the balance on the due date.

The second payment will be charged to the same account that was used for the initial payment when the due date arrives and will include a small service fee. MyCare Plan document preparation and printing will begin as soon as the second payment is obtained.

| | Split Payment : MyCare Plan | | | | | |
|-------------|---|----------|----------|-----------|--|--|
| Sale Amount | Sale Amount Payment Option First Payment Second Payment Total Payment | | | | | |
| \$499 | 30 Days | \$250.00 | \$260.00 | \$510.00* | | |
| \$399 | 30 Days | \$200.00 | \$210.00 | \$410.00* | | |

^{*\$11.00} Service Fee Added

- Customers enrolling in the Split Payment option must be entered through your Business Office.
- > To view the status of Split Payment customers, log into your Business Office and click on **Customer List** under the **Reports** tab.

Commission on the second payment will be the same amount as the first payment. Agents will receive half of the commission the following week after the first payment is received. The commission balance will be paid when the second payment is processed. If payments are declined, the client's service will be suspended, and commission will be delayed until the payment issues are resolved.

Note: On a Split Payment, the amount paid will count towards volume.

Example: If a customer opts for the \$499 Split Payment and pays an initial payment of \$250, only \$250 will count towards the Personal/Group Volume. When both payments are made, the volume counted will be \$510.

| Split Payment Commission | | | |
|--------------------------|------------------------|------------------------|--|
| Price | \$499 Installment Plan | \$399 Installment Plan | |
| Direct | \$75.00 | \$50.00 | |
| Level 1 | \$12.00 | \$7.50 | |
| Level 2 | \$9.50 | \$5.50 | |
| Level 3 | \$7.00 | \$4.00 | |
| Level 4 | \$4.50 | \$3.50 | |
| Level 5 | \$4.50 | \$3.50 | |
| Level 6 | \$2.50 | \$2.00 | |

Level Overrides

To receive Level Overrides on levels 1-6, agents must be Active and meet the eligibility requirements located to the left. If an agent is inactive, the override will roll up to the next active agent. Level Overrides are paid based on your current Paid As title.

| Level Override Qualifications | | | |
|-------------------------------|-----------------------------------|--|--|
| Level 1 | Eligible Upline Agent | | |
| Level 2 | Two Active Agents* | | |
| Level 3 | Field Trainer | | |
| Level 4 | Senior Field Trainer | | |
| Level 5 | Sales Director | | |
| Level 6 | Regional Sales Director and Above | | |

^{*}Agent must have at least two Personally Sponsored Agents in Active Status.

Customer Acquisition Bonus (CAB)

A Customer Acquisition Bonus (CAB) is a commission paid when a new agent produces the required amount of Sales Revenue within 70 days of entering the business. The CAB is paid to the enrolling agent and eligible upline. There are three types of CAB's: Initial, Remaining and Total. The amount of the CAB earned is contingent on the Paid As Title and is paid on your lineage organization only.

- ➤ If a new agent's enrollment fee is declined, no CAB will be paid.
- The initial CAB for new agents with a FES Protection Plan Membership is contingent on receipt of three consecutive monthly FES Protection Plan payments. If three payments are not received, the company reserves the right to retrieve a percentage of the CAB. If only one payment is received, a 50% CAB retraction will apply. If only two payments are received, a 25% retraction will apply.
- When placing an agent, the CAB payout's roll up from the Enrolling Sponsor.
- ➤ See following page for FES Protection Plan Membership CAB payouts.

Standard Agents will only receive direct commission for product sales. They are not eligible to receive CAB Bonuses, Level Overrides, Infinity Bonuses or any other compensation.

Customer Acquisition Bonus (CAB)

Direct Personal Sponsorship: Total Payout \$550

| FES Protection Plan Membership: | | | | |
|---------------------------------|----------|-----------|----------|--|
| Paid As Title | Initial | Remaining | Total | |
| Agent | \$40.00 | \$60.00 | \$100.00 | |
| Field Trainer | \$60.00 | \$100.00 | \$160.00 | |
| Senior Field Trainer | \$90.00 | \$150.00 | \$240.00 | |
| Sales Director | \$140.00 | \$240.00 | \$380.00 | |
| Regional Sales Director | \$160.00 | \$270.00 | \$430.00 | |
| Executive Sales Director | \$170.00 | \$305.00 | \$475.00 | |
| Vice President | \$175.00 | \$325.00 | \$500.00 | |
| Regional Vice President | \$177.00 | \$333.00 | \$510.00 | |
| Executive Vice President | \$179.00 | \$341.00 | \$520.00 | |
| Senior Vice President | \$181.00 | \$349.00 | \$530.00 | |
| Senior Regional Vice President | \$183.00 | \$357.00 | \$540.00 | |
| Senior Executive Vice President | \$185.00 | \$365.00 | \$550.00 | |

Override: Total Payout \$550

| FES Protection Plan Membership: | | | | |
|---------------------------------|---------|-----------|----------|--|
| Paid As Title | Initial | Remaining | Total | |
| Agent | \$0.00 | \$0.00 | \$0.00 | |
| Field Trainer | \$20.00 | \$40.00 | \$60.00 | |
| Senior Field Trainer | \$30.00 | \$50.00 | \$80.00 | |
| Sales Director | \$50.00 | \$90.00 | \$140.00 | |
| Regional Sales Director | \$20.00 | \$30.00 | \$50.00 | |
| Executive Sales Director | \$10.00 | \$35.00 | \$45.00 | |
| Vice President | \$5.00 | \$20.00 | \$25.00 | |
| Regional Vice President | \$2.00 | \$8.00 | \$10.00 | |
| Executive Vice President | \$2.00 | \$8.00 | \$10.00 | |
| Senior Vice President | \$2.00 | \$8.00 | \$10.00 | |
| Senior Regional Vice President | \$2.00 | \$8.00 | \$10.00 | |
| Senior Executive Vice President | \$2.00 | \$8.00 | \$10.00 | |

Initial CAB Upon Enrollment at \$288

Initial CAB: Partial CAB payouts.

New agent comes into the business as an FES Protection Plan Member.

Remaining CAB: Balance of available CAB pays out after initial CAB has been paid.

➤ New agent accumulates a total of two FES Protection Plan payments within their first 70 days.* *Does not include their own FES Protection Plan.

Total CAB: All qualifications are met in the same week that the agent enrolls.

Direct Deposit and Commission Checks

Each Direct Deposit and Commission Check will incur a \$4 accounting and banking fee.

The minimum amount of payout for a commission check is \$35. Your commission will be posted in your Business Office, held until the minimum amount has been reached. Once the \$35 minimum has been achieved, your check will be deposited/mailed out on the next commission payout date.

Bonus Volume

Bonus Volume is a non-monitory bonus which counts towards Group Volume.

| FES Protection Plan Membership (Agent and/or Customer) | 315 : One Time Bonus (Agent) 200 : One Time Bonus (Customer - Upon 3rd Payment) |
|---|--|
| Secured Card | 50 : One Time Bonus |
| Smart Credit | 15: Monthly Bonus (Basic Package- \$12.95) 20: Monthly Bonus (Premium Package- \$14.95) |
| Credit My Rent | CMR enrollment price may vary per customer. These options are to benefit the consumer. See chart on Page 8 for Bonus Volume details. |
| International Bancard: Merchant Services | Equal to Your One Time Total Commission Payout |

Credit My Rent Commission & Bonus Volume

| Credit My Rent Product | Product Price | Commission | Bonus Volume |
|---|---------------|------------|--------------|
| Enrollment Only Individual | \$25.00 | \$5.00 | 25 |
| Enrollment Only with Spouse | \$50.00 | \$10.00 | 50 |
| Enrollment + 12 Month Rental History Individual | \$85.00 | \$15.00 | 85 |
| Enrollment w/ Spouse + 12 Month History | \$110.00 | \$20.00 | 110 |
| Enrollment + 24 Month History | \$145.00 | \$25.00 | 145 |
| Enrollment w/Spouse + 24 Month History | \$170.00 | \$30.00 | 170 |
| Monthly Individual | \$6.95 | | 10 |
| Monthly with Spouse | \$9.95 | | 10 |

International Bancard: Merchant Services

The payment structure for International Bancard (Credit Card Processing) differs from all other FES services. Once a deal becomes final, commissions will be paid based on 1% of the new client's first month of volume - a one-time payout to the direct representatives with no level overrides.

In addition to the commission, Bonus Volume will be paid to the upline at the same 1% rate.

Example:

| Monthly Credit Card Processing Volume | 1% Commission | Bonus Volume (Paid to Upline) |
|---------------------------------------|---------------|-------------------------------|
| \$75,000.00 | \$750.00 | 750 |
| \$125,000.00 | \$1,250.00 | 1,250 |
| \$500,000.00 | \$5,000.00 | 5,000 |

1% commission will apply to all processing volume up to \$500,000.00 per month. Deals over \$500,000.00 per month are subject to a different commission structure based on the negotiated fee with the credit card processer.

Title Qualifications & Infinity Bonus

| Position | Monthly Group Volume | Agent Requirements | Team (Leg) Requirements | Infinity Bonus |
|---------------------------------------|----------------------------|---|--|------------------------|
| Field Trainer | \$1,600.00 | 2 Personally Sponsored Active Agents | 2 Separate Legs: w/Minimum \$400 Per Leg | N/A |
| Senior Field Trainer | \$5,000.00 | 2 Personally Sponsored Active Agents | 2 Separate Legs: w/Minimum \$500 Per Leg & Minimum 2 Active FT- 1 Must Be Lineage | N/A |
| Sales Director | \$10,000.00 | 3 Personally Sponsored Active Agents | 3 Separate Legs: w/Minimum \$1000 Per Leg & Minimum 3 Active FT- 2 Must Be Lineage | 0.5% Lineage GV |
| Regional Sales Director | \$25,000.00 | 3 Personally Sponsored Active Agents | 3 Separate Legs : w/Minimum \$2000 Per Leg & Minimum 3 Active SFT- 2 Must Be Lineage | 0.75% Lineage GV |
| Executive Sales Director | \$50,000.00 | 4 Personally Sponsored Active Agents | 4 Separate Legs: w/Minimum \$4000 Per Leg & Minimum 2 Active SD- 1 Must Be Lineage | 1 % Lineage GV |
| Vice President | \$100,000.00 | 4 Personally Sponsored Active Agents | 4 Separate Legs: w/Minimum \$10,000 Per Leg & Minimum 3 Active SD- 1 Per Leg, 2 Must Be Lineage | 1.5 % Lineage GV |
| Regional Vice President | \$250,000.00 | 5 Personally Sponsored Active Agents | 5 Separate Legs: ◆ 3 Separate Legs: Each w/ 1 Active RSD- ➤ 2 Must Be Lineage ◆ 1 Leg: w/ 1 Active SD ◆ 1 Leg: w/ \$10,000 in Volume | 1.75% Lineage GV |
| Executive Vice President | \$500,000.00 | 5 Personally Sponsored Active Agents | 5 Separate Legs: | |
| Senior Vice President | \$1,000,000.00 | 6 Personally Sponsored Active Agents | 5 Separate Legs: • 3 PSL Separate Legs: Each w/ 1 Active VP • 1 Leg: w/ 1 Active ESD • 1 Leg: w/ 1 Active RSD | |
| Senior Regional Vice President | \$2,500,000.00 | 6 Personally Sponsored Active Agents | 5 Separate Legs: • 3 PSL Separate Legs: Each w/ 1 Active RVP • 2 Separate Legs: Each w/ 1 Active VP | 2.5% Lineage GV |
| Senior Executive Vice President | \$5,000,000.00 | 7 Personally Sponsored Active Agents | 5 Separate Legs: • 3 PSL Separate Legs: Each w/ 1 Active SVP • 2 Separate Legs: Each w/ 1 Active RVP | 2.75% Lineage GV |

Agents who do not meet the qualifications for their Paid As title at month end will be given a Grace period the following month, during which they will continue to be paid at that title. However, if at the end of the Grace month they do not meet their title qualifications, they will be Paid As the title for which they are qualified.

FT - ESD = 1 Month Grace | VP - SEVP = 2 Month Grace

Infinity Bonus

The FES Infinity Bonus is designed to recognize and reward outstanding sales achievement by agents who excel at building active, successful organizations. This monthly bonus is paid when an agent achieves the Paid As position of Sales Director or above. Bonuses will be paid monthly during the second week of each month for the previous month. The Infinity Bonus is paid on lineage volume only.

You must maintain Group Volume and activity requirements at the Paid As title. Agents must be Active the entire qualifying month to receive the Infinity Bonus. If the same title is achieved in the same Team (leg), the Infinity Bonus will be divided up based on the volume generated by each individual title holder.

Title Qualification & Infinity Bonus Eligibility Requirements:

- ➤ All positions are Paid As titles.
- Group Volume is based on the qualifying month.
- > For all positions, qualifying agents with titles must be Active for leg minimum requirements.
- You must maintain Group Volume and activity requirements at the Paid As title. Agents must be active the entire qualifying month to receive the Infinity Bonus.
- See Page 9 for Infinity Bonus percentage table.

Generation Bonuses

Generation Overrides are paid on sales from levels 7 and below. Two levels of Generation Overrides will pay to those with Paid As titles of Executive Sales Director and above.

| Position | Level 1 | Level 2 |
|---------------------------------|---------|---------|
| Executive Sales Director | 1 % | 0.5% |
| Vice President | 1.5 % | 1 % |
| Regional Vice President | 1.75 % | 1.25 % |
| Executive Vice President | 2% | 1.5% |
| Senior Vice President | 2.25% | 1.75% |
| Senior Regional Vice President | 2.5% | 2% |
| Senior Executive Vice President | 2.75% | 2.25% |

Medallion Club Qualifications & Rewards

| Level | Personal PPM (Agents and/or Customers) | Agent Lineage PPM Required | Max PPM Used From Each PSA | Additional Requirements | Reward |
|-------------------|--|----------------------------------|----------------------------------|--|---|
| Bronze | 2 | 10 | 7 (70%) | N/A | Club Membership Card |
| Bronze Elite | 2 | 25 | 15 (60%) | N/A | Customized 16oz Hot & Cold Tumbler |
| Silver | 3 | 50 | 25 (50%) | N/A | Custom Embossed Business Card Holder |
| Silver Elite | 3 | 75 | 35 (45%) | N/A | Custom Inscribed Pen |
| Gold | 4 | 100 | 40 (40%) | N/A | Custom Embossed Portfolio |
| Gold Elite | 4 | 150 | 60 (40%) | N/A | Custom Embossed Travel Wallet & 2 Embossed Luggage Tags |
| Platinum | 5 | 200 | 80 (40%) | N/A | Custom Embossed Light Leather Jacket |
| Platinum Elite | 5 | 250 | 100 (40%) | N/A | Choice of Custom Embossed Leather Rolling Briefcase or Leather Backpack |
| Diamond | 6 | 350 | 125 (35%) | Must maintain qualification for 3 consecutive months | Shinola Watch |
| Diamond Elite | 6 | 450 | 160 (35%) | Must have attended 1 Annual Convention and must maintain qualification for 3 consecutive months. | Founders Day: One day with one or both Founders: Includes Travel, Accommodations, Activities, Dining, Custom Framed Photo |

- You must be an Active FES Protection Plan Member to be eligible for the Medallion Club.
- Each level receives one reward per agency. Medallion Club Members may purchase an additional reward at their highest level or any previous levels earned for themselves and/or their spouse or business partner.
- Medallion Club Members who achieve multiple levels during one (1) volume month only receive their highest earned level.
- Diamond Medallion Club Members who achieve Diamond Elite level during their three (3) month qualifying period will only receive the Diamond Elite reward, unless R&R Club Status is achieved (see below).
- Medallion Club Members who achieve R&R Club status during the qualification period of Diamond and Diamond Elite will forgo the rewards at these levels and receive their R&R Club benefit.

R&R Club Qualifications & Rewards

| Level | Personal PPM (Agents and/or Customers) | Agents Lineage PPM Required | Company PPM Required | *Max PPM Used From Each PSA | Reward |
|----------|--|--------------------------------|-------------------------|-----------------------------------|---------------------------------|
| | | | | | Up To \$600 Car |
| 1 | 7 | 500 | 10,000 | 35 % | Payment |
| | | | | | Must Be Audi- Max 3 Yrs Old* |
| | | | | | \$10,000 |
| 2 | 10 | 1,000 | 15,000 | 30 % | One-Time Bonus - |
| | | | | | 3 Consecutive Months |
| | | | | | \$1,500 Expense Allowance |
| 3 | 13 | 2,500 | 20,000 | 30 % | (Must Continue to Fulfill Level |
| | | | | | 1 Qualification) |
| | | | | | \$25,000 |
| 4 | 16 | 5,000 | 30,000 | 25 % | One-Time Bonus |
| | | | | | 4 Consecutive Months |
| | | | | | \$50,000 |
| 5 | 20 | 7,500 | 40,000 | 25 % | One-Time Bonus |
| | | | | | 6 Consecutive Months |
| | | | | | \$5,000 Monthly House |
| 6 | 25 | 10,000 | 50,000 | 20 % | Payment |
| | | | | | Paid Directly To Mortgage Co. |
| | | | | | Matching Monthly |
| 7 | 30 | 20,000 | 70,000 | 20 % | Retirement Bonus Up To |
| | | | , ,,,,,,, | | \$25,000* |
| | | | | | 3 Consecutive Months |
| | | | | | \$100,000 Bonus |
| 8 | 35 | 30,000 | 90,000 | 20 % | for 12 Months |
| | | | | | 3 Consecutive Months |
| | | | | | \$100,000 Lifetime |
| 9 | 40 | 40,000 | 110,000 | 15 % | Monthly Bonus |
| | | | | | 3 Consecutive Months |
| 4.0 | 4- | 50 000 | 405.000 | 450/ | \$250,000 Bonus |
| 10 | 45 | 50,000 | 125,000 | 15 % | for 12 Months* |
| | | | | | 3 Consecutive Months |
| D: | F0 | 75.000 | 450.000 | 45.07 | \$250,000 Lifetime |
| Pinnacle | 50 | 75,000 | 150,000 | 15 % | Monthly Bonus* |
| | | | | | 3 Consecutive Months |

^{*}This percentage stands for maximum percentage of FES Protection Plan Memberships allowed under any one Personally Sponsored Agent and their lineage team.

^{*}The company matches your monthly earnings up to \$25,000.

^{*}You receive these monthly or lifetime bonuses each time you are qualified at the appropriate level.

^{*}Must attend the FES Convention each year

Active: An agent must have a minimum of \$399 in Personal Sales Volume every 70 days or be enrolled in the FES Protection Plan to be eligible to receive Level and Generation Overrides and CAB and Field Training Bonuses.

Bonus Volume (BV): Volume given for selling certain products and services that do not pay monetary commissions.

Commission: Any money earned from Financial Education Services.

Customer Acquisition Bonus (CAB): When a qualified agent enrolls a new agent who produces a minimum of \$340 Personal Sales Volume within their first 70 days of entering the business, the Enrolling Sponsor and the qualifying upline agents will each receive CAB bonuses.

Direct: Refers to any agent that you personally enroll or the commission that you will receive as the selling agent.

Direct Commission: Money earned from personally submitted customer enrollments.

Enrolling Sponsor: The agent that is responsible for introducing and bringing in the new agent.

Genealogy: All agents within an organization, including the upline and all agents beneath them.

Grace Period: Agents who do not meet the qualifications for their Paid As title at month end will fall into a 30 or 60 day (depending on their title) Grace period to re-qualify for their title.

Group Volume (GV): The total dollar amount of commissionable services sold by a group, including the agent's personal volume.

Holding Tank: Another name for your Customer Placement / Sponsor Placement Report

Level: The vertical position an agent holds below another specified agent in a given leg.

Level Override: Commission earned from sales that take place on the various levels of an agent's organization.

Organization: The agents that an agent personally sponsors plus all of the agents they sponsor and any agents that were placed within their team. Example- An agent sponsors Joe, he sponsors Tom, who sponsors Mary and Jean. All of these agents are considered in that agent's organization.

Paid As (Title): Agents that have earned the various title designations according to the qualifications.

Personal Volume (PV): The total dollar amount of commissionable services sold by an agent. This amount does not include agent enrollment fees.

Placement: The agent who received the new agent into their organizations, only after it was placed beneath them by the Enrolling Sponsor. Placement can only take place within the first 60 days.

Roll Up: Commission is paid to qualified, eligible agents. When the intended agent fails to meet the minimum qualification requirements, the commission is passed to the next Active, eligible agent in the upline.

Team (Leg): All of the agents located beneath an agent, for whom a specific agent is the direct upline. Each Personally Sponsored Agent on your first level is part of your total organization and is a separate "team/leg"; you and your entire organization are one "team/leg" to your sponsor.

Upline: An agent's sponsor and all of the agents in the genealogy above an agent.

Title Qualifications & Infinity Bonus

| Position | Monthly Group Volume | Agent Requirements | Team (Leg) Requirements | Infinity Bonus |
|---------------------------------------|----------------------------|---|--|------------------------|
| Field Trainer | \$1,600.00 | 2 Personally Sponsored Active Agents | 2 Separate Legs: w/Minimum \$400 Per Leg | N/A |
| Senior Field Trainer | \$5,000.00 | 2 Personally Sponsored Active Agents | 2 Separate Legs: w/Minimum \$500 Per Leg & Minimum 2 Active FT- 1 Must Be Lineage | N/A |
| Sales Director | \$10,000.00 | 3 Personally Sponsored Active Agents | 3 Separate Legs: w/Minimum \$1000 Per Leg & Minimum 3 Active FT- 2 Must Be Lineage | 0.5% Lineage GV |
| Regional Sales Director | \$25,000.00 | 3 Personally Sponsored Active Agents | 3 Separate Legs: w/Minimum \$2000 Per Leg & Minimum 3 Active SFT- 2 Must Be Lineage | 0.75% Lineage GV |
| Executive Sales Director | \$50,000.00 | 4 Personally Sponsored Active Agents | 4 Separate Legs: w/Minimum \$4000 Per Leg & Minimum 2 Active SD-1 Must Be Lineage | 1 % Lineage GV |
| Vice President | \$100,000.00 | 4 Personally Sponsored Active Agents | 4 Separate Legs: w/Minimum \$10,000 Per Leg & Minimum 3 Active SD- 1 Per Leg, 2 Must Be Lineage | 1.5 % Lineage GV |
| Regional Vice President | \$250,000.00 | 5 Personally Sponsored Active Agents | 5 Separate Legs: • 3 Separate Legs: Each w/ 1 Active RSD- ➤ 2 Must Be Lineage • 1 Leg: w/ 1 Active SD • 1 Leg: w/ \$10,000 in Volume | 1.75% Lineage GV |
| Executive Vice President | \$500,000.00 | 5 Personally Sponsored Active Agents | 5 Separate Legs: | |
| Senior Vice President | \$1,000,000.00 | 6 Personally Sponsored Active Agents | 5 Separate Legs: ed •3 PSL Separate Legs: Each w/ 1 Active VP •1 Leg: w/ 1 Active ESD •1 Leg: w/ 1 Active RSD | |
| Senior Regional Vice President | \$2,500,000.00 | 6 Personally Sponsored Active Agents | 5 Separate Legs: • 3 PSL Separate Legs: Each w/ 1 Active RVP • 2 Separate Legs: Each w/ 1 Active VP | |
| Senior Executive Vice President | \$5,000,000.00 | 7 Personally Sponsored Active Agents | 5 Separate Legs: • 3 PSL Separate Legs: Each w/ 1 Active SVP • 2 Separate Legs: Each w/ 1 Active RVP | 2.75% Lineage GV |

Agents who do not meet the qualifications for their Paid As title at month end will be given a Grace period the following month, during which they will continue to be paid at that title. However, if at the end of the Grace month they do not meet their title qualifications, they will be Paid As the title for which they are qualified.



FES Protection Plan Membership

ENJOY EXCLUSIVE MONEY SAVING SERVICES WHILE PROTECTING YOUR IDENTITY, CREDIT, FAMILY, FINANCES, LIFESTYLE & FUTURE

CREDIT RESTORATION

experts and proven system to eliminate any inaccurate, obsolete or erroneous accounts. Using your rights under the Fair Credit Reporting Act to your advantage, we help you dispute the mistaken negative ratings that may be preventing you from obtaining new credit when you need it most. Lower your

- A+ rating with Better Business Bureau

- Monitor your progress online 24/7

ELSEWHERE \$99 per month



WILL, TRUST, POA

The decisions you make for yourself and your family are important because you know what's best for you. Unfortunately, in the event that you aren't able to speak on behalf of these decisions, someone that doesn't understand your wishes can end up making them for you. Without an estate plan in place, these crucial choices regarding YOUR health, finances and family are suddenly out of your control. Many people disregard planning for unexpected events because they're "too young" or it's "too expensive". Now you can have a comprehensive planning package, customized to your needs, covering each of the essential parts that make up a full estate plan.

- Developed by attorneys
 No add-ons or surprise charges
 Friendly, customer service staff to answer your questions
 Complete at your own pace from the privacy of your home
 Mailed to you in a professional binder ready to be signed and notarized
- Peace of mind for life's uncertainties

ELSEWHERE \$5,000 +



DEBT ZERO

DebtZero is a clear guide on how to more efficiently pay down your debt Taking into account your debt obligations and interest, the system will show you exactly how to properly allocate your money towards your monthly payments using nothing more than your current income in order to speed up your debt payoff. Not only will it map out the thousands of dollars you will be saving in interest by paying off your debt significantly earlier than expected. but it will show you the amount of hard earned money you can save by eliminating unnecessary years of interest payments!

- No extra income
- · No line of credit
- No refinancing
- No consolidation
- No change in lifestyle

ELSEWHERE \$50 per month



CREDIT ATTORNEY

We fix consumer credit reports in a legal and trustworthy manner and fight abusive debt collectors. We turn victims into victors as we step into an otherwise unfair fight started by debt collectors, creditors and credit reporting agencies. We are focused on you and not just your case. Our lawyers and paralegals band together to analyze your case and situation from all angles to bring about the best result in the guickest manner. We will work with you to determine your case eligibility and aim to stop debt harassment and clean up difficult to remove credit report errors from your credit file.

- Personal attention
- · Eliminate debt collector harassment
- Money damages awarded to you

ELSEWHERE \$250 + per hour



TRAVEL

When you travel, do so with confidence! Using our discount travel portal, you can feel secure knowing that you'll get more, simply by booking through us! We've partnered with over 500 of the finest hotels and resorts in more than 90 of the world's top vacation destinations to bring you the widest variety of vacation possibilities you'll find anywhere. Our packages include some of the best all-inclusive resorts in the Caribbean and Mexico- a great way to make the most of your vacation. Looking for a custom trip? Our paccations include: Corporate vacation. Looking for a custom trip? Our specialties include: Corporate Conventions, Incentive Travel, Family Cruises, Group Cruises, Grand Voyages, Destination Weddings, Luxury Vacations, African Safaris, **Escorted Tours and more!**

- Flights
- Hotels
- Car rental
- Vacation packages
- Create a custom trip

ELSEWHERE \$50 per month



SMART CREDIT

Manage all your online accounts in one place, integrated with your credit and identity. You can use Action buttons to ask your creditor a question about your account or a transaction. We automatically track and update your account balances, bills coming due and transactions every day. Access your interactive credit report, which is now easy to read and search or find anything quickly. It also includes your credit score, auto score, insurance score and even a hiring risk index for job seekers. Get alerts to your phone or email that someone opened credit in your name. Then use the Action button to stop the thieves.

- Credit monitoring alerts
- Instant statements
- Easily take action
- Daily transactions

ELSEWHERE \$25 per month



The Only Membership Of Its Kind-135

FINANCIAL LOCKBOX

If you're like most families, one person is generally designated to handle the financial aspects of the household. If you're single, you may be the only person who knows the type and location of your financial accounts. What if your loved ones suddenly found themselves in the position of taking over your finances without warning? Would they be able to locate insurance, bank and financial records in the event of an emergency? Financial Lockbox is an online solution that enables you to store financial data in a single, secure, password-protected location for easy access by you or loved ones that you select and authorize.

- · Establish a complete listing of all life insurance policies, bank accounts and other financial data
- · All your financial documents organized and easily accessible, especially handy at tax time
- Restore your records easily in case of fire, earthquake or flooding
- Your data is safe and secure against hackers with our state of the art encryption programs
- Appoint a contact person to be notified of your records in the event of an emergency

ELSEWHERE \$25 per month



POSITIVE CREDIT BUILDER

Understanding how your credit score is calculated and how to read your credit report are the first steps in improving your current standing. Our Credit Education Center offers a wide variety of educational services, credit tips and resources to help you take the necessary steps to enhance your credit score and manage your financial life. Improve your score by identifying the accounts that need immediate attention and understand the impact of the amount of credit you are using.

- A breakdown of the credit scoring system
- · Credit management techniques

ELSEWHERE \$10 per month



LifeLock®

Proactively safeguard your credit, your finances and your good name with vigilant services that alert you of potential threats before the damage is done. If identity thieves steal your personal information, they could take out a mortgage, commit tax fraud, open new credit accounts and a whole lot more. Our technology searches for potential misuse of your Social Security number, name, address or date of birth in applications for credit and services. You can choose alerts by text, phone, email or mobile app and respond immediately to confirm if the activity is fraudulent. We're confident in our ability to help protect your identity, but no one can prevent all identity theft. If you become a victim of identity theft. while a LifeLock member, we'll spend up to \$1 million to hire experts, lawyers, investigators, consultants and whomever else it takes to help your recovery.

- First in the industry to offer proactive identity theft protection
- Direct access to fraud resolution teams within our
- extensive network Internationally recognized for expertise in privacy and security technologies, fraud, and criminal
- Partnerships with FBI Law Enforcement Executive Development Association (FBI-LEEDA)

ELSEWHERE \$10 per month



RX DISCOUNT CARD

Lower your out-of-pocket prescription expenses with discounts ranging from 10% to 85% on most medications. Present your membership card along with your prescriptions to your pharmacist and ask to compare our contracted discount price with the pharmacy's retail price when the prescription is processed. You pay the lower of the two prices directly to the pharmacy at the point of sale, regardless of promotions and discounts.

- Average 31% savings
- Save 10-85% on generic and brand-name prescriptions
 Accepted at more than 60,000 pharmacies nationwide
 Everyone is eligible to use the card

- Easy to use just present your card and save!



SHOPPING PORTAL

Simply browse the offers available at our retailers or search for a specific product. When you're ready to earn rewards, just click through to the retailer via our link and complete your purchase. You can shop by searching for Stores, Deals or Products. Every time you shop at any of our 4,000 retailers, you are rewarded for your generated sale through that vendor. Your shopping experience is simple- using the exact same website your favorite retailer provides, but allowing you to earn Cash Back benefits. Want additional discounts? We often offer additional coupon codes to copy and paste at checkout.

- Higher cash back rates than competitors Shop from your PC, tablet or mobile phone Reliable and secure platform
- View your rewards anytime/anywhere Get paid via PayPal or check



ALSO INCLUDED IS ACCESS TO THE YFL'S ONLINE EDUCATION PROGRAM. HELP YOUR CHILDREN ACHIEVE FINANCIAL LITERACY AND A SOLID FINANCIAL FUTURE.

ALL OF THESE SERVICES INDIVIDUALLY COULD COST **OVER \$400 PER MONTH AND** THOUSANDS ANNUALLY.

THE FES PROTECTION PLAN IS ONLY \$89 PER MONTH!

OUT OF THIS \$89 MONTHLY PAYMENT. \$2 GOES TO THE YFL TO EDUCATE YOUTH ACROSS AMERICA & PROVIDE COLLEGE SCHOLARSHIPS.



Contact your local FES Agent:

Dessie Thomas (Financial Coach) dessielthomas@gmail.com (773) 609-4095

INQUIRE ABOUT HOW YOUR PROTECTION PLAN MEMBERSHIP CAN INCLUDE \$100,000 IN LIFE INSURANCE FOR FREE! NO MEDICAL EXAM REQUIRED.

Following up with your leads

- 1. Login to Business Back Office at https://secure.financialeduservices.com
- 2. Select "Lead Management" from your FES Connect Tab.
- 3. Contact the lead at the time stated best for lead. Scripts located below

Client Script (Replace red text with YOUR info)

- 1. Hello, it's nice to connect with you. My name is **YOURNAMEHERE** with **YOURCREDITNAMEHERE** and I saw you just went through our online system, and would like to know more about improving your credit score?
- 2. Tell me, what exactly are you looking to get done? Are you trying to get a car, home or negative items deleted? or maybe refinance?
- 3. Great, the process is pretty simple. Whatever negative items on your credit report will be disputed to be deleted. We do a hard pull on your credit report and dispute every negative item on your report at the same time with all 3 credit agencies, creating a very quick turnaround. Customers start seeing results in just 45-90 days with us.

You will also get your own customer portal to track your progress every step of the way and about 12 other additional services at no additional cost which includes but are not limited to:

- Identity theft protection
- Discount shopping and travel
- 24/7 credit monitoring
- 24/7 access to a free credit attorney
- a Will, Trust and Power of Attorney

It's \$188 to get started. Then it's just \$89 every month after for however long you want the service. It's not a contract; however we recommend that customers stay on the service for about 3-6 months. We have an A+ rating with the BBB and 100% Satisfaction guaranteed.

4. SEND LINK!



LAUNCH DOCUMENT

| START DATE: | _ 🗖 DOCUMENTS@MYFES.NET | ☐ FESPROTECTIONPLAN.COM | |
|----------------------------|-------------------------|-------------------------|--|
| MYFES.NET/USERNAME: | | PW: | |
| FESPROTECTIONPLAN.COM USER | NAME: | (Email Address) PW: | |

TEXT "FES" TO 89800 | Visit www.MomentumSociety.net

START WITH WHY

Strive for 5!



- Acquire 5PPM
 2 Agents + 3 Customers
 NOW DUPLICATE!
- Get ROI
- Earn \$380
- Promoted to FT
- FREE Service!
- Qualify Up to \$100k Life Ins.

| Paid As Title | Initial | Remaining | Total |
|---------------------|---------|-----------|-------|
| Agent | \$40 | \$60 | \$100 |
| Field Trainer | \$60 | \$100 | \$160 |
| Senior FT | \$90 | \$150 | \$240 |
| Sales Director | \$140 | \$240 | \$380 |
| Leadership Position | UP | то | \$550 |

| TOP 20 CONTACTS | | | |
|-----------------|--|--|--|
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

INVITE SCRIPT

| GRAND OPENIN | G: Day | Time: | FALL BACK: Day | Time: |
|---------------|------------------------------|-------------------------|-------------------------|--------------------------|
| HEY | _, I ONLY HAVE A MINUTE. I J | UST PARTNERED UP WITH S | OME VERY SUCCESSFUL PI | EOPLE WHO'S LAUNCHING A |
| HUGE MOVEMENT | AND I THOUGHT ABOUT YOU. | DO YOU KNOW ANYONE W | ITH LESS THAN PERFECT O | REDIT OR IS OPEN TO SOME |

EXTRA MONEY IF IT DIDN'T INTERFERE WITH WHAT YOU'RE DOING NOW? (NOTE: PAUSE AND LISTEN FOR THE ANSWER)
PERFECT! I CAN'T PROMISE YOU ANYTHING. BUT WHAT ARE YOU DOING ON (DATE/TIME)?

WE HAVE TO GET TOGETHER FOR ABOUT 30 MINS!!

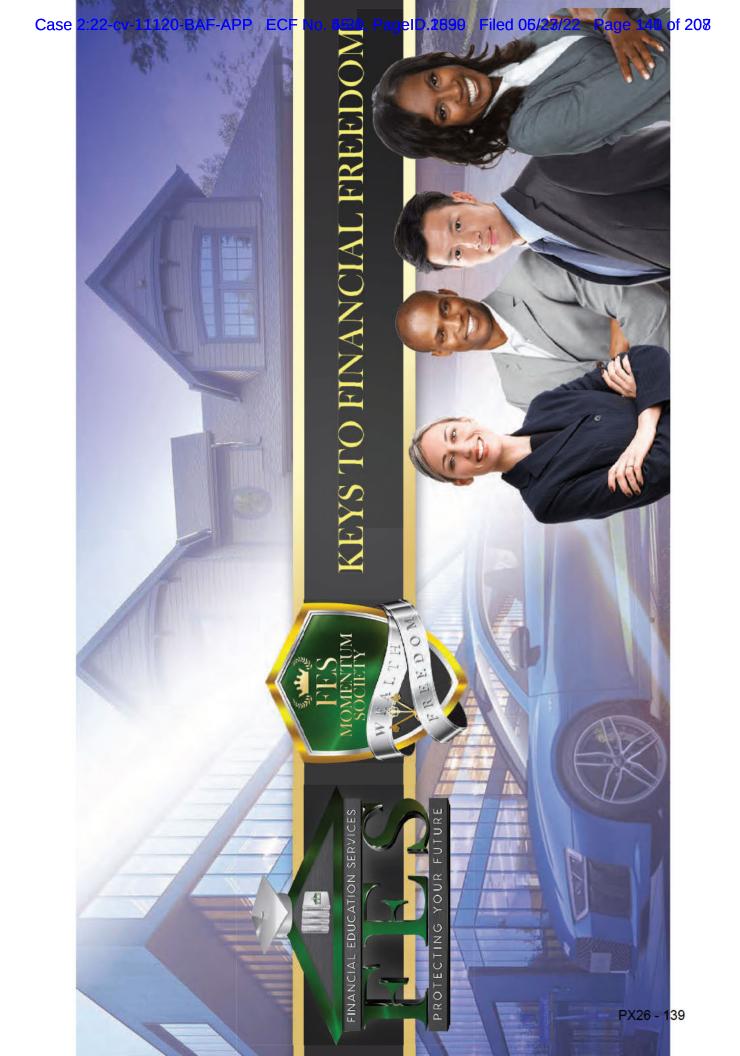
STAY PLUGGED IN!

VISIT: WWW.MOMENTUMSOCIETY.NET

ONLINE WEBINAR LINK INFO

☐ TEAM CALL

■ WEEKLY MTG ADDRESSF8x286F-0138





The State Of America's Personal & Financial Affairs

Nearly half of Americans don't know their credit score ((SOUCE ((SOUCE HATERDED POST MORE))

About 43 million people have a 599 credit score or lower

Average debt is over \$225,000 with many having less than \$500 in savings was manyed.

49% have no retirement and only 18% know they're on track to reach their income goals for retirement

65% have no will, 82% have no trust & 71% have no power of attorney remainders.

Over \$58 billion in unclaimed life insurance policies, bank accounts, pensions, stocks, other assets and property

Every 2 seconds an identity is stolen (source Javelin Strategy & Research)



KEYS TO FINANCIAL FREEDOM

Think About It... How Many People. Why FES?

Have less than perfect credit?

Have debt and no idea how to pay it off?

Don't have their personal & financial affairs in order?

Dislike their current job and are looking for a career change?



KEYS TO FINANCIAL FREEDOM

Think About It...How Many People. Why FES?

Need to make more money?

Can't afford an annual vacation?

Aren't where they want to be in life?

Just want a solution and plan of action?



KEYS TO FINANCIAL FREEDOM



Why Is This?









KEYS TO FINANCIAL FREEDOM

Didn't Teach Us About Personal Finances or Success

Our Formal Education



FINANCIAL EDUCATION SERVICES

We Provide:

The financial education and success training we needed a long time ago Services that protect your identity, credit, family & finances

Lucrative and life changing opportunities













Founded in 2004

Mike Toloff

Same key executives since the company's inception Headquartered in Farmington Hills, Michigan A+ Rating with the Better Business Bureau Over 100% in annual sales growth Debt free





A Plan That Protects Your Identity, Credit, Family, Finances, Lifestyle & Future! The Protection Plan Membership







What's In Your Protection Plan Membership?

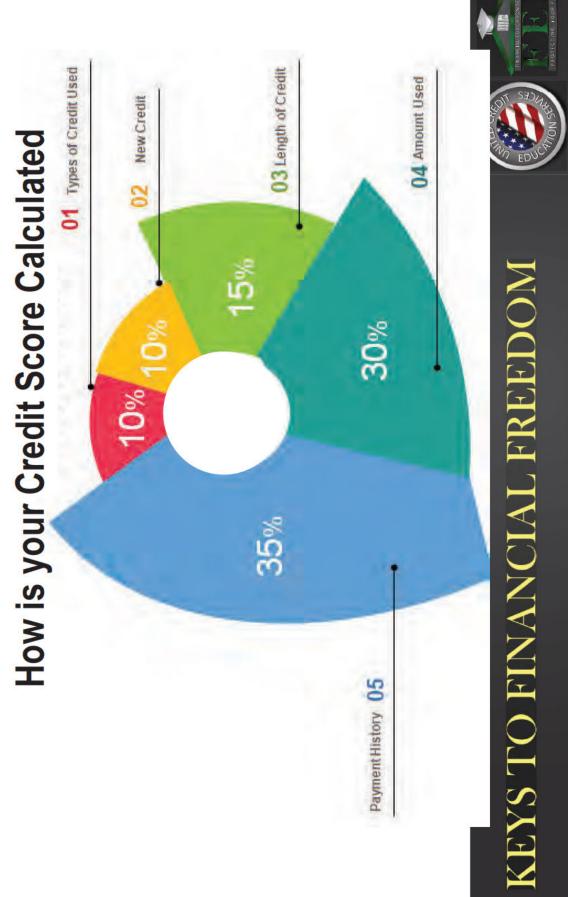


Emphasis On Credit

Today your credit score is like a vital sign, it's being monitored at all times it can impact insurance premiums & interest rates

You can be denied the ability to rent, purchase, get a credit card or even employment Over the course of your lifetime less than an excellent credit rating could cost you \$200,000 to \$1,000,000





5 Common Myths About Your Credit

Myth #1

Credit Agencies are empowered with some kind of governmental authority?

Credit agencies have no legal authority at all, they are simply private companies who are in the phusiness of selling credit information.

Myth #2

The credit agencies are required by law to keep derogatory items on your credit report for 7 to \$6

years?

There is no law that the credit agencies report anything on you at all. Credit Agencies are

required by law to automatically remove all derogatory items older than 7 years student loans 🗟 There is no law that the credit agencies report anything on you at all. Credit Agencies are and more, or in the case of a bankruptcy, 10 years.

5 Common Myths About Your Credit

Myth #3

The information on your credit report cannot be changed; is it illegal or immoral to have the information on your credit report altered or removed? The opposite is true under the Fair Credit Reporting Act; both the federal and various Fastate laws REQUIRE that items be removed if they are not 100% accurate or cannot be Fastelied in a timely manner verified in a timely manner.

Myth #4

Paying a past due debt removes it from your credit report?

Just because you pay an old debt does not change or erase the fact that at one time yor were not paying on it as you agreed. Can this record be changed? Absolutely!



5 Common Myths About Your Credit

Myth #5

Inquiries are not derogatory and will not affect your credit standing?

case of inquiries, one or two is not too bad, but any more than that and they begin to telka story of their own. Any prospective credit grantor will look at your credit report and think that you are desperate for credit. And removed using Fair Credit Reporting Act it Anything that erodes your financial credibility is damaging to your credit standing. In the think that you are desperate for credit. And removed using Fair Credit Reporting Act it cannot come back.





You Can Restore Your Score

The Fair Credit Reporting Act of 1971 gives Americans the right to dispute and/or investigate any item on their credit report: Inaccurate, erroneous & obsolete items such as late payments, and many other items can be removed from your credit file or bankruptcies, tax liens, collections, short sales, medical bills, charge-offs, foreclosures, judgments, repossessions, can be updated to reflect paid as agreed.





United Credit Education Services CREDIT RESTORATION

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Leverage your legal rights to investigate, dispute and challenge negative items on your credit report.

Inaccurate, erroneous or obsolete items such as late payments, collections, bankruptcies, judgments, medical bills, etc. can be potentially deleted or updated on by your credit reports.







| RE 09/2012 04/2012 04/2013 01/2013 01/2013 01/2013 01/2011 00/2012 | Accounts | AMOCO GAS CARD COLLECTION XXXX2524 | COLLECTION COLLECTION | INQUIRY NAVE BUY | JACKSON COUNTY CREDIT XXXX1001 | WELLS FARGO FORECLOSURE XXXX2335 | AMERICAN EXPRESS COLLECTION XXXX7324 | CHASE MORTGAGE FORECLOSURE XXXX0802 | EDU SERVE COLLECTION | TAX LIEN xxxx4346 | REPOSSESSION XXXX8051 | |
|---|----------|------------------------------------|-----------------------|------------------|---------------------------------|----------------------------------|--------------------------------------|-------------------------------------|----------------------|-------------------|-----------------------|--|
| | Date Op | | | 04/2012 | | | | | | 12/2011 | | |
| | Status | In Dispute | In Dispute | In Dispute | In Dispute | In Dispute | Deleted | Deleted | Deleted | Deleted | Deleted | |

BUARANTEE

United Credit Education Services CREDIT RESTORATION

Almost 15 year track record



Tens of thousands of satisfied clients

Satisfaction Guaranteed















Other Valuable Credit Building Services

Positive Credit Builder - Recommendations for adding positive tradelines to your credit profile



DebtZero - Interactive online debt payoff system and budgeting tool.



Credit Monitoring – Access to your credit scores and credit reports 24/7.













Will, Trust, POA & Financial Lockbox

A program developed by attorneys

Organize all of your personal & financial information in this virtual password-protected safety

deposit box

Easy to use services with client support available







Money Saving Benefits:







Prescription discounts ranging from 10% to 85%.

Use your own FES discount travel portal.

Shop online at your favorite retailers and get cash back.

Insurance Solutions - You have access to experienced insurance professionals for all your insurance needs.



WHAT ARE OUR SATISFIED CUSTOMERS ARE SAYING!



"After having our bankruptcy removed, we were able to purchase a home with a low, fixed interest rate, which saved us almost \$1,000 per month."

Johnny & Sandra Moler, Dallas, TX

~ Yvette Reid, Cherry Hill, NJ point that my car insurance premium was lowered by "In just two months, my credit score increased to the \$2,000 per year!" After just 45 days I had a tax lien and a foreclosure deleted from my credit reports!"

~ Vinny Ho, Westminster CA



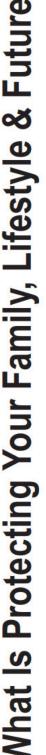


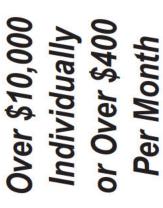






What Is Protecting Your Family, Lifestyle & Future Worth









Par





ES YFL \$25k scholarship

Youth Financial Literacy Foundation (YFL)





Each Protection Plan Membership Donates \$2 Each Month To The YFL. Educates Young People From Ages 8 to 18 On The Matters Of Personal Finance.

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Financial Literacy In Schools Across America.

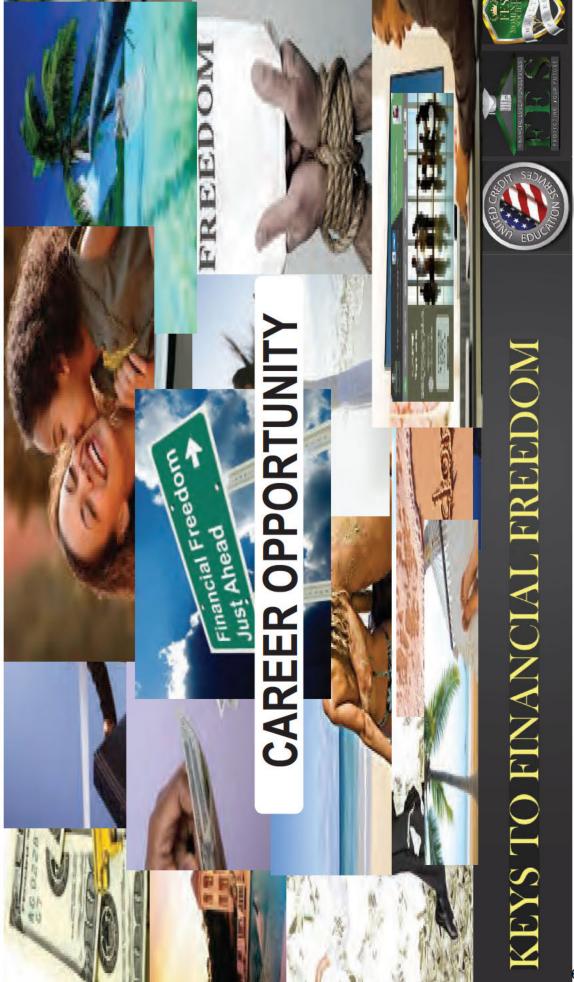
Awards Hundreds Of Thousands Of Dollars In College Tuition Annual College Scholarships – The YFL

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Each Year.





How Many People Today Control Their.

Income? Schedule? Advancement?

Benefits? Retirement & Future?





















KEYS TO FINANCIAL FREEDOM





















"Where Corporate America Meets Entrepreneurship Hybrid Marketing..









What Do We Do To Earn Income & Benefits?

WE HAVE TWO DIVISIONS

Developing Corporate Accounts & Establishing Personal Clients:

Protection Plan Membership Sales & Sales of Individual Services

Business Development:

Recruit, Train & Manage A Nationwide Sales Organization



Corporate Accounts



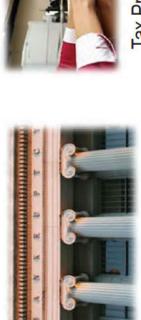
Car Dealerships

Real Estate Agents



Tax Professionals





Bankruptcy Attorneys

Settlement Companies









you can earn \$100

Customer

COMMISSION

Customer

\$100

For each Protection Plan sale you can earn

\$100

There is NO limit to the amount of customers you can acquire!

Protection Agent with a Plan

\$100

Customer

residual income. per month **Plus \$12** \$100



Theoretical Example: Strive for FIVE!

Income Potential:

5 PP customers per month can = \$500 per month

5 PP customers per week can = \$2,000 per month

10 PP customers per week can = \$4,000 per month

20 PP customers per week can = over \$100,000 per year



Financial Education Services, Inc., and any of their affiliate companies make(s) no guarantees to the level of financial success an Independent Agent can achieve.

All examples are purely theoretical for explanation purposes only. All income you receive will depend upon your individual effort and ability.



Business Development

hundred people's efforts rather than 100% of your own." "It's better to get 1% of a

~ J. Paul Getty, Billionaire





\$100 CAB + Residual



\$100+

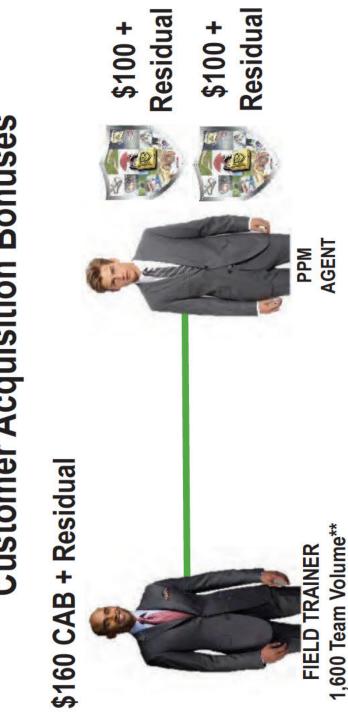
Residual

AGENT

*Any combination of sales that total \$340 will trigger a Cushomer Acquisition Bonus
Financial Education Services, Inc., and any of their affiliate companies make(s) no guarantees to the level of financial success an independent Agent can achieve.

All examples are purely theoretical for explanation purposes only. All income you receive will depend upon your individual effort and ability.

AGENI



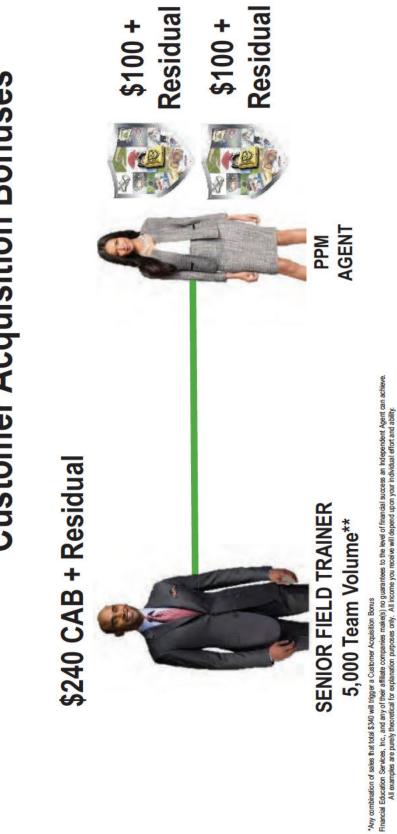


KEYS TO FINANCIAL FREEDOM

Financial Education Services, Inc., and any of their affiliate companies make(s) no guarantees to the level of financial success an independent Agent can achieve.

All examples are purely theoretical for explanation purposes only. All income you receive will depend upon your individual effort and ability.

*Any combination of sales that total \$340 will trigger a Customer Acquisition Bonus



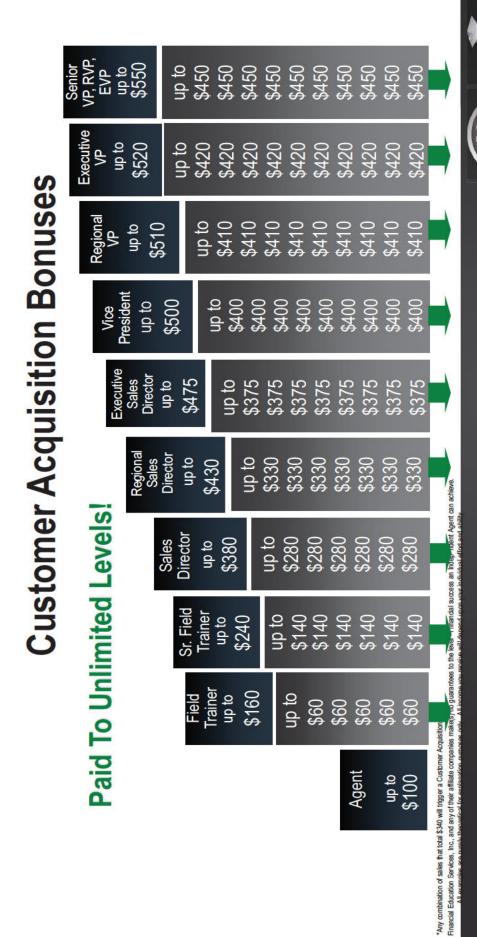


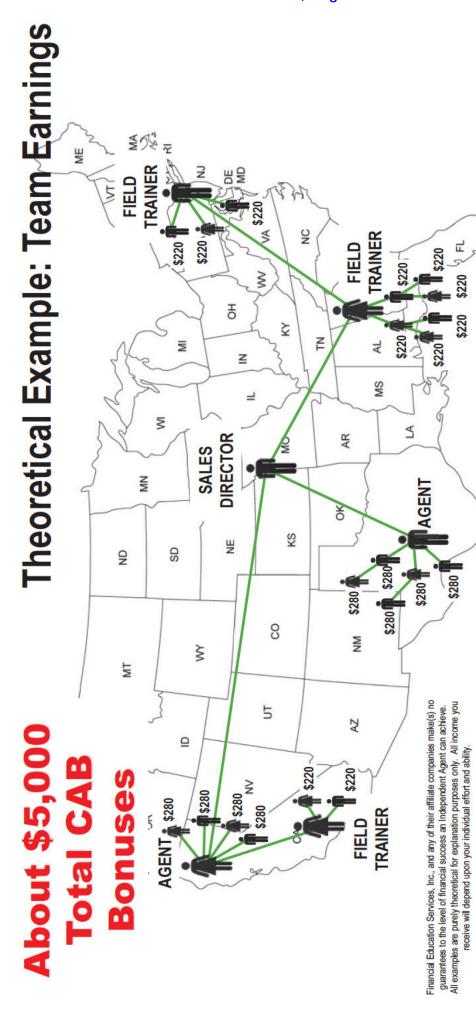
Residual Residual \$100+ \$100+ AGENT PPM \$380 CAB + Residual 10,000 Team Volume** SALES DIRECTOR



KEYS TO FINANCIAL FREEDOM

*Any combination of sales that total \$340 will trigger a Customer Acquisition Bonus Financial Education Services, inc., and any of their affiliate companies make(s) no guarantees to the level of financial success an independent Agent can achieve. All examples are purely theoretical for explanation purposes only. All income you receive will depend upon your individual effort and ability.





In this Theoretical Example

If you did this once a month = about \$5,000.00/Month

= about \$20,000.00/Month If you did this once a week

What if you did this twice a week = ??? Financial Education Services, Inc., and any of their affiliate companies make(s) no guarantees to the level of financial success an Independent Agent can achieve. All examples are purely theoretical for explanation purposes only. All income you receive will depend upon your individual effort and ability.





The POWER of the Protection Plan Membership Theoretical Residual Income Example:

Strive for FIVE!







5 Agents and/or Customers

People / Level Override





91 J,000,1110 \$7,500/mo #7F 000/-\$750/mo

Financial Education Services, Inc., and any of their affiliate companies make(s) no guarantees to the level of financial success an Independent Agent can achieve All examples are purely theoretical for explanation purposes only. All income you receive will depend upon your individual effort and ability





KEYS TO FINANCIAL FREEDOM

19,530 PPM

15,625

3125

125

25

625

The FES R & R Club Building Towards Rest, Relaxation, & Retirement!!!

The Accumulation Of Personal & Team PPM – Min. 500 PPM Required)



Up To \$600 Monthly Audi Payment



One-time \$10K, \$25K & 50K Cash Bonuses

\$1,500 Expense Allowance



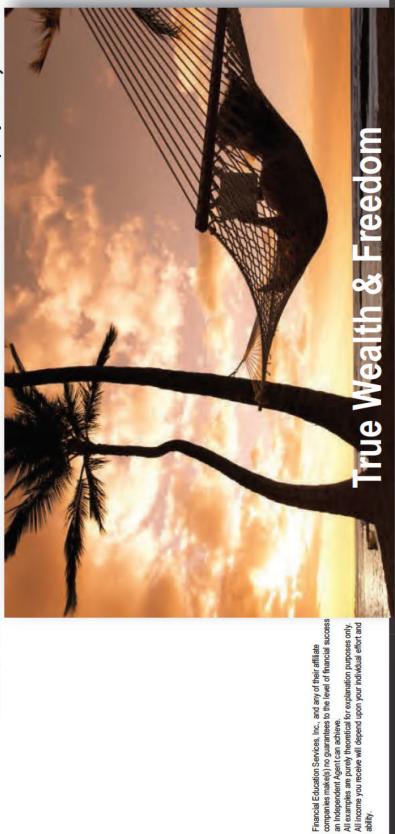
From \$100K - \$250K Monthly Lifetime Bonuses

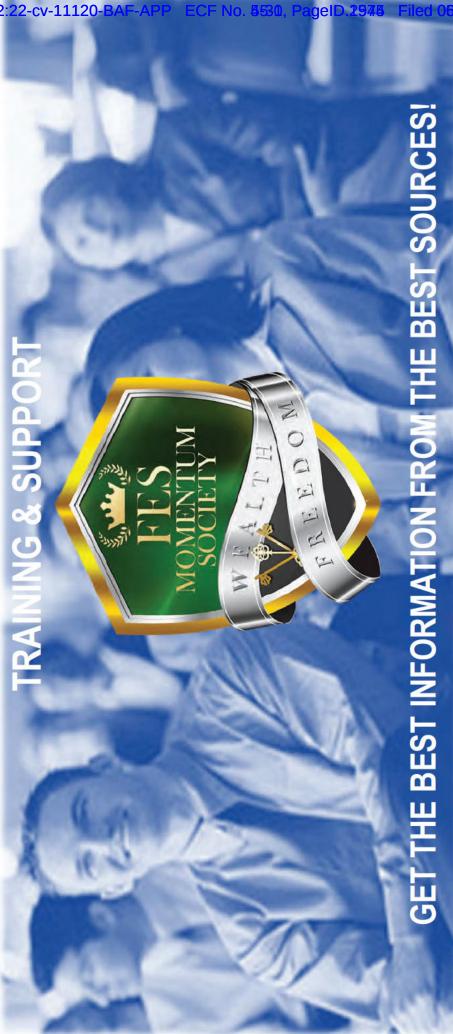


\$5k Monthly House Payment Monthly Bonus Bo Up To \$25k



The FES R & R Club R&R Club Total Benefits Are Worth Over \$3,000,000 Annually





THE CASE OF THE PARTY OF THE PA

Local Trainings

Conference Call Training

Online Training

Regional 1-Day Basic Trainings

Training & Support

Regional 2-Day Advanced Trainings National 3-Day Leadership Trainings

KEYS TO FINANCIAL FREEDOM

6 - 185

Regional Vice President and the R&R Club! Our retirement and future Wayman & Jean Kimpson, Atlanta, GA "As Real Estate Brokers we depended on closings and sometimes we waited weeks and even months causing us tremendous stress. Now FES is our fulltime career and FESA has paved the way to



President and R&R Club. With this amount of money my future backwards due to a changing industry and my financial future trainings of FESA combined with hard work led me to Vice was in jeopardy. FES was just what I needed and with the "As a business owner, I was watching my income go *is no longer a concern!"*~ Warren Bauerfeld, Minneapolis, MN

Individual results may vary. There is no guarantee to the level of success you will achieve.

dreams were gone. FES got me out of broadcasting and using could barely make ends meet. I was frustrated and felt like my "I was a radio broadcaster and while it may sound good I the FESA system and trainings helped me to become a

Regional Vice President and R&R Club member. Now I fing

have my dreams back!"

~ David Moon, Annandale, VA



Individual results may vary. There is no guarantee to the level of success you will achieve.

woman named Nicola Smith Jackson, not only did she offer me a life changing opportunity, she has mentored me to do the same for my community here in was state. I can't thank her enough for introducing this wonderful business to use that has about the community of the same for my community here in was state. l struggled with my credit score for so long, and never knew where to start. Or Nicola Smith Jackson advertising "Credit Restoration, low monthly cost". I was evening, spoke to Nicola and became a Protection Plan Member in Novembe was a complete stranger. I had nothing to lose so I made that call late in the skeptical at first because it all seemed too good to be true and because she 2016. In less than 30 days several negative accounts were deleted and my credit score increased by an amazing 106 points. Today, this phenomenal day as I was scrolling through Instagram, I came across a woman named -VP Sabrina Leu that has changed so many lives.



amazing team and also amazing leaders that have been tremendous help in o Six figure earners, be awarded a free Audi, cruise contest winners, and hit lev two in the R&R Club. Our life has changed drastically and I thank God that Heelege placed this opportunity before my wife and I. We have been blessed with an have money saved, and used my last check to pay our bills for the month, notal knowing what we were going to do I found FES on Instagram, took a chance 🧟 investing our last leaving \$1.09 in our bank account would be the best decisio we could have ever made. Fast forward to now, we've been blessed to becom growth with FES! We are forever grateful for this company and know that with month from my job of 5 years working as a P.E Teacher. My wife and I didn't We joined FES a little over 15 months ago. At the time I had been fired for a what I believed would be just some extra income for us, I didn't know that God we will continue to soar to great heights! Anthony & Ilice Jackson



Regional Vice Presidents

saved lots of money on my travel expenses by using the travel portal for spring break business had grown to a BIG BUSINESS. I'm a master's prepared registered nurse working for a major insurance company and now my part-time FES income has started with FES as an agent in February 2016 under Mr. Ashton Henry. I needed the services in the Protection Plan Membership more than anything. My credit was awful because I was never educated. My score increased 230 points in 3 months, began telling my friends and family about the services and before I knew it, my with my children and I take advantage of the prescription discounts. exceeded my full time pay in Corporate America.

21, 2017!! See what happens when you have less than perfect credit and you're not I'm excited to share that I will become FULL TIME FES as a Vice President on Jun afraid to share your own testimony? I'm now living my dreams!!

Alicia Gaines Vice President



193 of 208

Level Of Interest

Have excellent credit, all my personal affairs in order and have a successful career, but could provide referrals.

Interested in the Protection Plan Membership.

Interested in the PPM and the financial opportunity! just need a game plan on how to get started!







Step#1 Enroll & Become an Agent

\$288

\$199 Enrollment + \$89 Protection Plan Membership





Professional Training

What You And Your Team Will

- How to Establish Corporate Accounts
- ✓ How to Sell Protection Plan Memberships
- How to Establish a Substantial Team of Agents
- How to Manage a Nationwide Organization
- How to Understand and Maximize the Compensation Plan
- ✓ How to Build a Long-Term Residual Income
- How to Become a Successful FES Leader
- The Right Mindset and Attitude for Success With FES
 LEARN FROM TOP PRODUCERS HOW TO BE

A TOP PRODUCER!

Much More!





Once You Are Enrolled You Receive:

- A Personalized Web Site
- An Online Sales Tracking System
- / Agent & Customer Support
- Access To Professional Marketing Materials
- Weekly Pay
- Tax Advantages





Step #2 – Become A Protection Plan Member Protect Yourself & Your Family

Benefits of a Protection Plan Membership

\$89 per month (Includes All Services & Benefits) *remember 5 agents/customers = FREE







II

II















KEYS TO FINANCIAL FREEDOM



Up To \$100,000 In Life Insurance

Step # 3 – Expose People To FES

Develop Sales, Corporate Accounts & Other Agencies

Who Do You Know...

Has less than perfect credit?

Does not have a will, trust or power of attorney?

Who has debt and would benefit from a system to pay it off?

In credit related industries? (Real Estate, Mortgage, Auto, Banking)

Who is looking for part-time or full-time income?

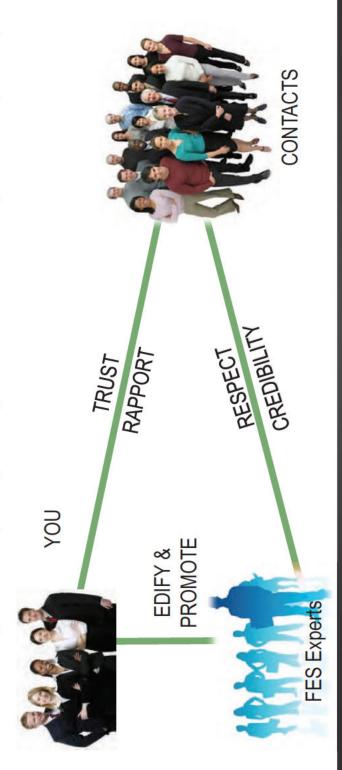
Who is frustrated with their current career and needs a change?

Wants to become financially free?





"Become great at exposing while you learn to become great at explaining." How To Expose People To Financial Education Services





A Quick Recap

What is your level of interest?

- Provide Referrals
- Become a Customer
- Become an Agent and Customer
 Immediate Start Today- \$288



Congratulations And Welcome To The FES Team!



Case 2:22-cv-11120-BAF-APP ECF No. 5530, PageID.2902 Filed 06/23/22 Page 203 of 208

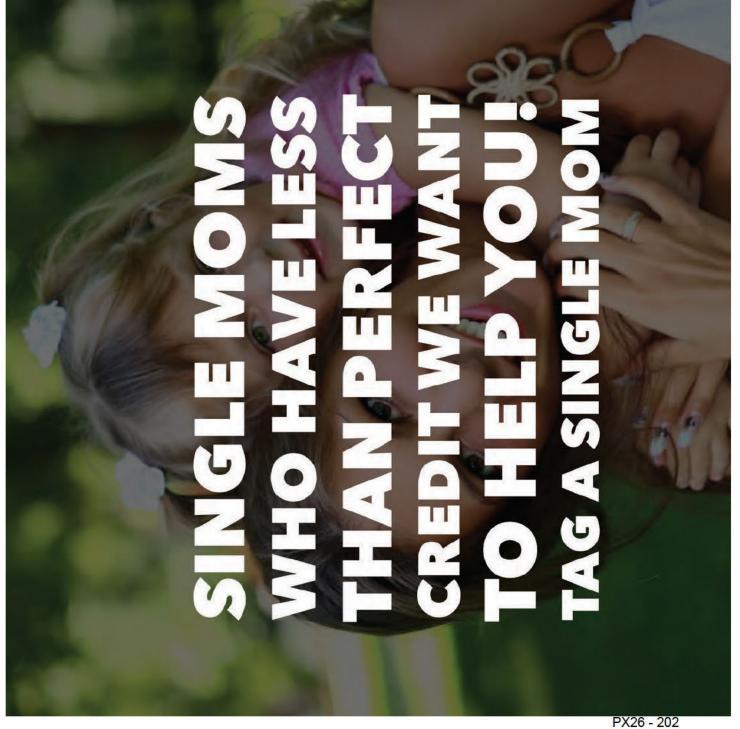


NEW AGENT CHECKLIST

COMPLETE THE FOLLOWING TASK AS QUICKLY AS POSSIBLE

Note: Following a systematic approach will help to significantly increase the pace in which you achieve results. Buy following this step-by-step "Things to do list" you are getting off to the best start possible. Congratulations on joining forces with a great company and a dynamic group of people that will encourage you, support you, and most importantly, help you succeed in your FES career. Always remember the more you work the system...the more the system will work for you! It's as easy as 1,2,3!

| Things To Do Now: | COMPLETED |
|---|------------|
| Opt-In For The Text Messaging Program: (Text the letters FES to 89800, You will be prompted to enter your full name | e) |
| Visit www.MomentumSociety.net | \equiv |
| Join under "Member Portal" Select "Forms & Documents" under "Member Portal" and Download Getting Started Documents Join our private group, Financial Leaders of America on Facebook | |
| Schedule Your First Training Session Dates: Location: Location: | 一 |
| (Conference Calls, Webinars, Video, Evening or Saturday Training) | |
| Get Familiar With Your Back Office | |
| (Commissions Tab, 445 Calendar, Reports "Organizational Structure, Medallion Club", Calls/Webinars, Training Tab, Setup FE | S Connect) |
| FES Protection Plan Services—Activate Initial (www.FESProtectionPlan.com) | |
| Credit Restoration Smart Credit Lifelock Life Insurance Submission | |
| Fill Out Your FES Career Commitment Agreement | |
| Fill Out Your Prospective Account Customer/Agent List (Access & Utilize) - LAUNCH DOCUMENTS | |
| Send Out Your First 5 Text & Make Your Calls (Access & Utilize Phone Scripts/Swipes) Send Out Your First 5 Video Links | ks |
| Your First Win | |
| Launch your business and "Strive for Five"!: 2 AGENTS + 3 SALES = (PROMOTION + FREE SERVICES) | |
| Next Steps To Success | |
| Use your marketing materials, videos and resources to accelerate your success! | |
| 1) Get several Financial Literacy Challenges Completed by Prospects & Turned In. | |
| 2) Watch Videos: Visit MomentumSociety.net and select Library under "Member Portal" | H |
| 3) Order Your Business Cards | H |
| 4) Upload Your Picture To Your Website | |
| 5) Pro Leader Bootcamp Date:Location: | |
| 6) Get a Half Inch (1/2) Binder for your Script Book (Print off scripts, events, trainings and calls calendar) | |
| 7) Finish Setting Up Your Protection Plan Services: Will, Trust, & Power of Attorney, Debt Zero, Financial Lockbox | |
| 8) Start Your Players Club List | |
| 9) Get Connected and Stay Committed! | |
| FESBuilding Futures Toge | 26.20er |



Thank you for your interest. This is a life changing opportunity and business. Don't take this information lightly as our system and leadership has helped several individuals earn 6 figures and walk away from their job.

Financial Education Services (FES): Financial Education Services has been helping consumers achieve their highest financial potential for over 10 years. We pride ourselves on our Accredited A+ Rating with the Better Business Bureau: A representation of our personal commitment towards customer satisfaction.

We aim to help customers meet your financial goal while also providing them with the tools for long-term, consistent success.

We've successfully removed bankruptcy, repo, collections, medical bills, tax liens, and many other negative or derogatory items from our client's credit files.

We dispute every negative item on our client's report. It is because of this that we have such a quick turnaround. Customers start seeing results in 45-90 days with us.

Most companies would charge their customers \$500-\$2,500, or a monthly fee of over \$100, and only pull one credit bureau report at a time, meaning it takes longer for you to see results and they keep collecting the monthly fee. We do not hold our customers hostage. We charge only \$89/mo. We do not make our customers sign a contract; they're on a month by month basis. You can cancel at any time with no penalty.

Business Opportunity/Investment Cost: Our career opportunity provides a foundation for individuals and teams that are driven, highly motivated and looking for access to immeasurable success- while positively changing lives across the country. To begin your Financial Education Service Franchise as an Agent your initial investment cost is \$288 and \$89 a month. The \$89 includes the services listed below. Please note that the \$89 a month is waived once you enroll your first 5 clients/agents.

Your benefits include:

- Your personal Credit Repaired
- \$100,000 in Life Insurance
- Credit Builder
- Credit Attorney
- Will, Trust, POA
- Lifelock
- Financial Lockbox

- Smart Credit
- DebtZero
- FES Travel
- And More

Compensation plan (Pay): Start earning \$100 to \$550 for your customers and agents Every Thursday! (Direct deposit or check). Pay week starts Sunday morning ends Saturday night.

For your convenience I've attached a combination of flyers, videos, link and a Power Point to give you more of an overview of the services we provide with our popular Protection Plan and Agent enrollment.

Take a look and enroll *TODAY*:

https://www.financialeducationservices.com/CompanyOverview.aspx?rid=DThomas30

https://www.fesconnect.net/DThomas30

Let's Grow Together!

Welcome to FES PROTECTION:

Congratulations on investing in yourself and securing your financial future.

The process is simple:

Log on <u>www.fesprotectionplan.com</u> Log in username: <u>your email address</u>

Password: <u>Last 4 SSN</u>

Please send a copy of your Drivers License (or state ID with current address) and SS card to Documents @united-credit.org

Below is a video on how to get started: https://fes.wistia.com/medias/sxhj3xnxs0

Some things to expect:

- We pull your credit report from all 3 credit bureaus
- We dispute all the negatives items on all 3 reports at the same time (This will give you a quick turnaround)
- You will start seeing results in 45-90 days
- It's only \$188 to start and \$89 a month (you will receive your receipt via email).

Be sure to take advantage of the other services in your portal Smart Credit:

- Credit Monitoring
- Life Lock: Identity Theft Protection
- Debt Zero: Budgeting and Debt Tool
- Will/Trust/Power of Attorney: Estate Directive and Asset Protection
- And More....

If you have any questions feel free to call our customer service line at 248-848-9065 option 1 to activate your services.

Again, thank you for your business!!!!

PS: I appreciate referrals and would love to give you some referral fees 😇

Dessie Thomas